

# Exhibit B

Date	Atty	Time	Description
10/24/2023	SLW	2.4	Drafting response to defendants' latest counter mediation proposal explaining plaintiffs' positions including cost, stay, scope of required pre-mediation agreement, and data required
10/24/2023	TP	0.4	Attention to D. Hutchison correspondence re method of analysis of .10c invoices
10/24/2023	TP	1.2	Attention to SLW's counter mediation proposal and correspondence re same and EDR and JBM edits to it
10/25/2023	EDR	0.4	Correspondence with data scientist regarding test the rest sampling
10/25/2023	EDR	0.7	Correspondence with defense counsel regarding data production
10/25/2023	EDR	0.9	Revise, finalize and serve mediation counterproposal
10/25/2023	SLW	1.9	Further editing plaintiffs' updated mediation parameters proposal to defendants
10/25/2023	TP	0.2	Conference with EDR regarding same
10/25/2023	TP	0.3	Review of SLW email re mediation and damages
10/25/2023	TP	2.2	Formulating strategy for additional damages discovery and conducting caselaw research in connection with same
10/25/2023	TP	2.7	Researching [REDACTED]
10/26/2023	EDR	0.2	Call with S. Wittels regarding Bottle Bill discovery
10/26/2023	EDR	0.9	Email to defense counsel regarding database data production
10/26/2023	NAR	0.9	Draft email re prejudgment interest research for TP
10/26/2023	NAR	3.7	Research case law re prejudgment interest
10/27/2023	EDR	1	Draft email to defense counsel regarding data and Bottle Bill discovery
10/27/2023	EDR	1.1	Conference with S. Wittels, T. Palikovic regarding data and Bottle Bill discovery
10/27/2023	SLW	0.1	Confer w- EDR and TP regarding mediation strategy
10/27/2023	SLW	2.3	Researching [REDACTED]
10/27/2023	TP	0.5	Conference with EDR and SLW regarding data analysis
10/28/2023	SLW	0.6	Confer with EDR regarding [REDACTED]
10/30/2023	EDR	0.3	Correspondence with defense counsel regarding test the rest review
10/30/2023	EDR	0.5	Revise email to defense counsel regarding Bottle Bill discovery
10/30/2023	JBM	0.5	Attention to emails from SLW re tracking deposits and returns
10/31/2023	EDR	0.3	Correspondence with vendor regarding new production and test the rest review
10/31/2023	EDR	0.5	Correspondence with defense counsel regarding Bottle Bill discovery
10/31/2023	EDR	0.7	Conference with data scientist regarding redemptions in data production



Date	Atty	Time	Description
10/31/2023	JBM	0.2	Office conference with EDR and TP re work items while EDR is absent
10/31/2023	NAR	0.2	Calendar discovery deadlines
10/31/2023	SLW	0.9	Editing email to defendants regarding refund deposit account required by bottle bill and demand that defendants produce account together with any related data
10/31/2023	TP	0.2	Conference with JBM and EDR re upcoming tasks
10/31/2023	TP	0.4	Reviewing and revising email to defense counsel re data production and search terms
10/31/2023	TP	1.1	Conference with SLW and EDR regarding data analysis and Bottle Bill discovery
11/1/2023	JBM	0.7	Attention to email correspondence from defense counsel re document production and email response to EDR in connection with same
11/1/2023	SLW	0.9	Drafting and editing supplemental demand to defense counsel regarding plaintiffs' request for deposit refund account and related deposit data including \$.05 cent call deposits as well as \$.10 deposits and handling of refunds in separate accounts
11/2/2023	JBM	0.5	Attention to email correspondence from EDR re document production and respond to same
11/2/2023	SLW	0.3	Conferring with team regarding strategy for supplementing and providing discovery responses in light of defense demand for rolling production from plaintiffs
11/3/2023	EDR	0.9	Document production
11/3/2023	JBM	0.2	Attention to email correspondence between EDR and defense counsel re bottle bill deposit accounting
11/3/2023	JBM	0.2	Email to defense counsel requesting meet and confer
11/3/2023	JBM	0.5	Office conference with TP regarding same
11/3/2023	JBM	0.5	Review of email communications from EDR to defense counsel regarding data issues and email correspondence with EDR in connection with same
11/3/2023	NAR	0.3	Review and respond to TP questions re prejudgment interest
11/3/2023	TP	0.5	Conference with JBM regarding Bottle bill discovery and damages issues
11/3/2023	TP	1.5	Reviewing NAR research regarding interest rate and drafting correspondence with follow up questions re same
11/6/2023	JBM	0.2	Attention to scheduling matters
11/6/2023	JBM	0.2	Office conference with TP in connection with same
11/6/2023	JBM	0.2	Review email correspondence from EDR regarding outstanding meet and confer matters
11/6/2023	NAR	0.5	Draft notice of appearance for TP
11/6/2023	TP	0.2	Call with JBM regarding scheduling and prejudgment interest research
11/7/2023	JBM	0.2	Telephone conferences with SLW in connection with same
11/7/2023	JBM	0.2	Attend and lead status conference for Plaintiffs



Date	Atty	Time	Description
11/7/2023	JBM	0.2	Follow up review of documents and calendaring matters in connection with same
11/7/2023	JBM	1	Prepare for status conference with magistrate judge and review documents in connection with same
11/7/2023	TP	0.2	Review of NOA and email with NAR re same
11/10/2023	SLW	0.4	Upon receipt of intended order from J Krause re period of discoverable data re refunds, review thereof and communicating analysis to team
11/11/2023	SLW	0.3	Submitting correspondence to Judge Krause in light of his recent order resolving discovery disputes
11/13/2023	EDR	0.2	Send RICO research to T. Palikovic
11/13/2023	EDR	3.7	Document review
11/13/2023	JBM	0.2	Email to defense counsel regarding same
11/13/2023	JBM	0.5	Office conference with NAR regarding next steps
11/13/2023	JBM	0.7	Review and annotate J. Krause database ruling and follow up legal research in connection with same
11/13/2023	NAR	0.1	Email EDR re transcript order
11/13/2023	NAR	0.3	Discuss doc review with EDR
11/13/2023	SLW	0.3	Upon receipt of J Krause order ECF 137 granting in part Plaintiffs' motion to compel (ECF No. 90), review thereof
11/13/2023	TP	2.6	Researching [REDACTED]
11/14/2023	EDR	0.6	Draft email regarding meet and confer
11/14/2023	EDR	0.8	Prepare for meet and confer with defense counsel
11/14/2023	EDR	0.8	Meet and confer regarding discovery related to Bottle Bill refund value account
11/14/2023	JBM	0.2	Office conference with TP and EDR re meet and confer on data issues
11/14/2023	JBM	0.5	Attention to correspondence regarding discovery
11/14/2023	NAR	0.4	Order hearing transcript and emails re same with reporter
11/14/2023	SLW	0.7	Participating on conference call regarding defendants' refund deposit account
11/14/2023	TP	0.2	Call with JBM and EDR regarding data analysis
11/14/2023	TP	0.3	Reviewing and revising EDR draft of follow up email to defense counsel and reviewing notes of meet and confer in connection with same
11/14/2023	TP	0.4	Prepare for meet and confer
11/14/2023	TP	0.8	Attend and lead meet and confer with defense counsel regarding discovery deficiencies and refund value account
11/15/2023	EDR	0.3	Conference with B. McInturff, T. Palikovic regarding mediation
11/15/2023	EDR	0.3	Conference with S. Wittels regarding mediation
11/15/2023	EDR	0.3	Call with client [REDACTED]
11/15/2023	EDR	0.7	Correspondence with defense counsel regarding Bottle Bill refund value account discovery
11/15/2023	JBM	0.2	Review defendant response to Plaintiff's settlement proposal
11/15/2023	JBM	0.2	Office conference with TP regarding same



Date	Atty	Time	Description
11/15/2023	JBM	0.2	Follow up email correspondence with team regarding same
11/15/2023	JBM	0.5	Office conference with TP and EDR regarding mediation terms and discuss response to Manhattan Beer settlement proposal
11/15/2023	SLW	0.3	Review Eric P's responses to Plaintiffs' summary re further ESI custodians and aggregation of 10c accounting methodology
11/15/2023	SLW	0.4	Review defendants response to plaintiffs updated mediation parameters proposal
11/15/2023	TP	0.2	Call with JBM and EDR regarding settlement proposal
11/15/2023	TP	0.5	Conference with EDR and JBM regarding settlement strategy
11/15/2023	TP	0.5	Review of P. Ripin settlement proposal and related internal correspondence
11/16/2023	JBM	0.2	Save documents to case file
11/16/2023	JBM	0.2	Attention to emails regarding potential mediators and email correspondence with colleagues regarding same
11/16/2023	JBM	0.5	Review bio of [REDACTED]
11/16/2023	NAR	0.1	Circulate hearing transcript
11/16/2023	NAR	0.2	Email TP and court reporter re invoice payment
11/20/2023	EDR	0.2	Prepare for meet and confer
11/20/2023	EDR	0.5	Meet and confer regarding refund value account discovery
11/20/2023	EDR	0.5	Draft response to Defendants' mediation proposal
11/20/2023	SLW	0.4	Review defendant's fourth set of document demands including for documents related to Defendants' affirmative defenses regarding plaintiffs' purported "failure to mitigate," "conduct of plaintiffs," and "Contributory negligence"
11/20/2023	TP	0.1	Attention to Defendants' responses to Pls' 4th RFPs
11/20/2023	TP	0.8	Prepare for and lead meet and confer regarding data productions
11/21/2023	EDR	0.2	Call with S. Wittels regarding exemplar invoices
11/21/2023	EDR	0.3	Send hearing transcript to defense counsel
11/21/2023	EDR	0.5	Call and correspondence with client regarding exemplar invoices
11/21/2023	JBM	0.2	Office conference with EDR re mediation and discovery strategy
11/21/2023	SLW	0.6	Upon receipt of defendants' responses to plaintiffs' fourth request for production of documents, review and analysis thereof
11/22/2023	EDR	0.2	Review and analyze data scientist analysis of returns
11/22/2023	EDR	0.3	Send production to ILS for loading into database
11/22/2023	SLW	0.7	Drafting response to defendants' proposal on mediation parameters and mediation MOU
11/24/2023	JBM	0.2	Attention to SLW draft mediation proposal letter and office conference with EDR in connection with same
11/24/2023	JBM	0.2	Call with SLW in connection with same
11/24/2023	JBM	0.2	Further edits to letter
11/24/2023	JBM	1	Revise and edit SLW draft mediation proposal letter
11/24/2023	SLW	1.7	Editing letter to defendants regarding mediation parameters
11/25/2023	SLW	0.9	Editing and finalizing letter to defense counsel regarding agreed-upon terms for mediation settlement parameters



Date	Atty	Time	Description
11/27/2023	EDR	0.4	Email to defense counsel regarding next production
11/27/2023	EDR	0.8	Conferences with B. McInturff, T. Palikovic regarding strategy
11/27/2023	EDR	1.1	Email to defense counsel regarding start date of class members' customer tenure
11/27/2023	EDR	3.8	Document review
11/27/2023	JBM	0.2	Research potential damages experts and email to M. Officer re phone availability
11/27/2023	JBM	0.2	Attention to scheduling emails
11/27/2023	JBM	0.5	Office conference with EDR and TP re damages model strategy
11/27/2023	SLW	0.6	Conferring with potential expert Micah Officer regarding damages
11/27/2023	TP	0.5	Attention to internal notes re data analysis and damages methodology
11/27/2023	TP	0.5	Conference with JBM and EDR regarding damages strategy
11/27/2023	TP	0.5	Reviewing and revising email to defense counsel regarding data production
11/28/2023	EDR	0.8	Call with potential expert for damages backcast
11/28/2023	EDR	0.8	Draft privilege log
11/28/2023	EDR	1.1	Review and analyze opinion excluding potential expert
11/28/2023	EDR	6.1	Review and analyze Defendants' production
11/28/2023	JBM	0.2	Prepare for call with M. Officer re damages model
11/28/2023	JBM	0.7	Lead call with M. Officer
11/28/2023	SLW	0.3	Review new excel chart produced by Defendants with additional data fields
11/28/2023	TP	0.4	General research re use and preparation of financial backcast models
11/28/2023	TP	0.5	Attention to defense counsel follow up from 11/20 meet and confer and correspondence re same with D. Hutchison
11/28/2023	TP	0.7	Conference with M. Officer, JBM and EDR
11/29/2023	EDR	2.3	Email defense counsel regarding start date of class members' customer tenure
11/29/2023	EDR	3	Document review
11/29/2023	JBM	2.2	Review prior transcripts and proposed mediators in preparation for mediator discussion and mediation-related issues
11/29/2023	SLW	1.2	Consider defendants' counter proposal on pre-mediation agreement, and communicating with potential mediators and team regarding strategy for mediation
11/29/2023	TP	0.6	Reviewing and revising correspondence to defense counsel re data production deficiencies
11/30/2023	EDR	0.3	Call with B. McInturff, T. Palikovic, S. Wittels regarding mediation proposal
11/30/2023	EDR	0.5	Email defense counsel regarding mediation
11/30/2023	EDR	0.5	Draft letter seeking extension of discovery dispute deadlines
11/30/2023	EDR	0.5	Finalize and file letter seeking extension of discovery dispute deadlines
11/30/2023	JBM	0.2	Telephone conference with SLW, EDR, and TP re mediation strategy



Date	Atty	Time	Description
11/30/2023	JBM	0.2	Attention to calendaring matters
11/30/2023	JBM	0.2	Attention to request for extension correspondence and emails with TP and EDR regarding same
11/30/2023	JBM	0.2	Attention to email from defense counsel regarding request for extension correspondence
11/30/2023	JBM	0.2	Review mediator bios in connection with same
11/30/2023	JBM	0.5	Office conference with TP and NAR re mediation strategy matters
11/30/2023	JBM	0.5	Attention to SLW email re mediators and email response to same
11/30/2023	SLW	0.1	Review new updated data and latest produced spreadsheet with more data fields
11/30/2023	SLW	0.3	Communicating with WMP team regarding stay without selecting a mediator
11/30/2023	TP	0.2	Call with JBM, EDR and SLW regarding mediation issues
11/30/2023	TP	0.3	Review and revising correspondence to defense counsel re data production issues and stay
11/30/2023	TP	0.5	Conference with JBM and NAR regarding mediation strategy
11/30/2023	TP	0.6	Attention to internal correspondence regarding selection of mediators and mediation strategy
12/1/2023	EDR	0.2	Email with defense counsel regarding production
12/1/2023	EDR	1.3	Call with data scientist regarding new sample data
12/1/2023	EDR	1.4	Email to defense counsel regarding data production issues
12/1/2023	JBM	0.2	Attention to emails from defense counsel re production timelines and email to EDR regarding same
12/1/2023	JBM	0.2	Attention to email correspondence regarding potential damages expert
12/1/2023	JBM	0.5	Attention to emails regarding mediators and telephone conference with SLW regarding same
12/1/2023	SLW	0.7	Conferring with Darren Hutchinson @ Hexabyte team regarding data in light of MBeer's latest product of new data fields regarding deposits and returns
12/1/2023	TP	0.4	Attention to correspondence with defense counsel regarding data production questions
12/1/2023	TP	1.3	Post-conferral review of D. Hutchison analysis and outline of notes re same
12/1/2023	TP	1.5	Preparation for and conference with D. Hutchison re analysis of new data
12/4/2023	EDR	0.3	Email defense counsel regarding production
12/4/2023	EDR	0.4	Email mediator regarding claims in case and scheduling
12/4/2023	EDR	0.4	Call with S. Wittels regarding production and mediation
12/4/2023	EDR	0.6	Email to defense counsel regarding sample data
12/4/2023	EDR	0.8	Call with data scientist regarding new sample data
12/4/2023	EDR	2.2	Document review
12/4/2023	JBM	0.2	Office conferences with TP and EDR re strategy matters
12/4/2023	JBM	0.7	Review prior expert retainer agreements and office conference with EDR regarding [REDACTED]



Date	Atty	Time	Description
12/4/2023	TP	0.2	Call with JBM, EDR and SLW regarding mediation and discovery strategy
12/4/2023	TP	0.3	Correspondence with D. Hutchison regarding newest representations re data from defense counsel
12/4/2023	TP	0.6	Preparation for conference w. D. Hutchison
12/4/2023	TP	0.8	Conference with D. Hutchison regarding new data and earlier data analysis
12/5/2023	EDR	0.2	Correspondence with data scientist regarding redemptions
12/5/2023	EDR	0.4	Review and analyze defense counsel email and spreadsheet regarding redemptions
12/5/2023	EDR	3.4	Document review
12/5/2023	JBM	0.2	Office conference with EDR re client productions and privilege logging issues
12/5/2023	TP	0.5	Correspondence with D. Hutchison regarding invoice examples
12/6/2023	EDR	0.4	Correspondence with vendor regarding document production
12/6/2023	EDR	0.4	Correspondence with defense counsel regarding document production
12/6/2023	EDR	0.8	Review and analyze privilege log
12/6/2023	EDR	1.2	Document review
12/6/2023	JBM	0.2	Office conference with EDR re discovery disputes
12/6/2023	JBM	0.2	Office conference with EDR re damages expert kicking off analysis
12/6/2023	JBM	0.2	Conference with EDR re mediation dates strategy
12/6/2023	JBM	0.2	Call with TP regarding same
12/6/2023	JBM	0.2	Email correspondence with SLW regarding selection of mediators
12/6/2023	JBM	0.5	Telephone call with SLW regarding selection of mediators
12/6/2023	NAR	0.2	Review emails with opposing counsel
12/6/2023	SLW	0.4	Review response from Peter R regarding dispute as to stay despite plaintiffs' request for outstanding data, review thereof
12/6/2023	TP	0.2	Attention to email correspondence with defense counsel regarding Pls' opposition to a stay
12/6/2023	TP	0.2	Call with JBM regarding mediation scheduling
12/6/2023	TP	0.4	Attention to casefile and scheduling
12/7/2023	EDR	0.8	Finalize and send production and privilege log
12/7/2023	JBM	0.2	Conference with EDR re mediators and potential improper class member contacts
12/7/2023	JBM	0.2	Attention to email re data issues
12/7/2023	SLW	0.3	Communicating with team regarding proposed mediation agreement and strategy
12/8/2023	EDR	0.3	Call with S. Wittels regarding class contact by defense counsel
12/8/2023	EDR	2.7	Document review
12/8/2023	JBM	0.7	Emails re scheduling matters and attention to emails re improper class member contacts
12/8/2023	SLW	0.3	Communicating with four separate potential mediators' re availability



Date	Atty	Time	Description
12/8/2023	SLW	0.8	Finalized email communication to defense counsel responding to defendants' counter proposals of Nov. 29 and December 6 are regarding mediation parameters, stay, selection of mediator
12/8/2023	TP	0.4	Internal correspondence regarding mediation agreement and response to defense counsel
12/8/2023	TP	0.8	Correspondence with defense counsel regarding data production questions and discrepancies
12/8/2023	TP	1.2	Review of SLW email summary re curative notice and conducting research re same
12/9/2023	SLW	0.4	After finalizing and sending summary of terms for mediation to defense counsel, receipt of defense counsel Ripin's response
12/11/2023	EDR	0.4	Attend court conference
12/11/2023	EDR	0.4	Conference with S. Wittels regarding mediation and case strategy
12/11/2023	EDR	1	Correspondence with mediator regarding scheduling and mediation logistics
12/11/2023	JBM	0.2	Office conference with EDR re status conference
12/11/2023	JBM	0.2	Attend discovery status conference
12/11/2023	JBM	0.2	Office conference with EDR re mediation dates
12/11/2023	SLW	1.3	Conferring with defense counsel Peter R and Eric P regarding mediation agreement and communicating with Mediator Scheinman's office regarding Florida mediation availability, and preparing for status conference before Judge Krause
12/11/2023	TP	0.6	Correspondence regarding mediation scheduling
12/12/2023	EDR	0.4	Download production and send to e-discovery vendor
12/12/2023	JBM	0.2	Attention to mediation scheduling emails
12/12/2023	TP	0.2	Correspondence re scheduling of mediation
12/12/2023	TP	0.2	Internal correspondence regarding potential experts
12/13/2023	EDR	0.4	Review and analyze redemption invoices
12/13/2023	EDR	0.4	Call with data scientist regarding redemption invoices
12/13/2023	JBM	0.5	Attention to scheduling emails re mediation
12/13/2023	TP	0.7	Attention to Defendants' revised responses to pls' 1st interrogatories and notes on same
12/13/2023	TP	0.7	Attention to Defendants' revised responses to pls' 1st RFPs and notes on same
12/14/2023	EDR	0.4	Send exemplar data and invoices to M. Officer.
12/14/2023	EDR	0.6	Conference with S. Wittels, B. McInturff, T. Palikovic regarding mediation and improper class contact
12/14/2023	EDR	0.8	Draft document requests regarding customer declarations
12/14/2023	EDR	0.9	Conference with D. Hutchison and M. Officer regarding damages model
12/14/2023	EDR	0.9	Email defense counsel regarding supplemental data production
12/14/2023	JBM	0.2	Attention to email re mediation strategy
12/14/2023	JBM	0.2	Office conference with EDR re mediation strategy
12/14/2023	JBM	0.2	Follow up office conference with TP regarding same
12/14/2023	JBM	0.5	Office conference with TP, EDR, and SLW regarding mediation strategy



Date	Atty	Time	Description
12/14/2023	TP	0.2	Call with JBM regarding same
12/14/2023	TP	0.5	Conference with SLW, JBM and EDR regarding mediation strategy
12/14/2023	TP	1	Conference with D. Hutchison, M. Officer and EDR regarding damages model and backcasting
12/15/2023	EDR	0.2	Correspondence with expert regarding damages model
12/15/2023	EDR	1.1	Email defense counsel regarding customer declarations
12/15/2023	EDR	1.4	Finalize and serve document requests regarding customer declarations
12/15/2023	JBM	0.2	Attention to emails regarding discovery requests for improper class member contacts
12/15/2023	SLW	0.6	Editing further proposed mediation agreement
12/15/2023	SLW	0.9	Communicating with mediator Scheinman's office and defense counsel regarding mediation date in February together with process for mediation, and addressing logistical issues with FL mediation
12/15/2023	SLW	1.6	Editing and finalizing cover letter and discovery demands to defendants regarding 121 improper declarations obtained from customers on the \$.10 illegal bottle deposit charge as well as all contacts made to prospective customers for daily declarations
12/15/2023	TP	0.5	Review of 5th requests for production re improper declarations internal correspondence re same
12/18/2023	EDR	0.2	Correspondence regarding data production
12/18/2023	EDR	1.4	Revise mediation agreement
12/18/2023	JBM	0.2	Save documents to case file
12/18/2023	JBM	0.2	Office conference with NAR re mediation agreement and discovery issues
12/18/2023	JBM	0.2	Office conference with TP regarding damages analysis
12/18/2023	TP	0.2	Call with JBM regarding damages calculation for settlement
12/19/2023	SLW	0.3	Communicating with defense counsel and Mediator Scheinman's office regarding mediation agreement, logistics, and mediator's compensation
12/19/2023	TP	0.4	Attention to mediation agreement and correspondence regarding same
12/19/2023	TP	0.6	Attention to summary of analysis approach by M. Officer
12/20/2023	EDR	0.5	Call with D. Hutchison regarding data production
12/20/2023	EDR	1.1	Draft letter to court regarding stay
12/20/2023	EDR	1.2	Draft MOU for settlement
12/20/2023	EDR	2.4	Draft email to defense counsel regarding data production deficiencies
12/20/2023	JBM	0.2	Attention to email correspondence regarding mediation
12/20/2023	JBM	0.2	Office conference with EDR regarding proposed settlement term sheet
12/20/2023	SLW	0.7	Finalizing and circulating penultimate draft of mediation agreement to defense counsel
12/20/2023	TP	0.3	Attention to latest round of defense counsel edits to mediation agreement and correspondence re same



Date	Atty	Time	Description
12/20/2023	TP	0.4	Attention D. Hutchison correspondence re assessment of 12/15 data production
12/20/2023	TP	0.5	Call with D. Hutchison re data analysis
12/21/2023	EDR	0.3	Correspondence regarding updated data production
12/21/2023	EDR	0.6	Finalize and file letter motion requesting stay
12/21/2023	EDR	0.8	Correspondence with defense counsel regarding mediation agreement and letter for stay
12/21/2023	JBM	0.2	Telephone conference with SLW re settlement strategy
12/21/2023	JBM	1.7	Legal research re [REDACTED]
12/21/2023	SLW	0.4	Drafting and communicating with defense counsel regarding joint proposed letter requesting court stay action pending mediation
12/21/2023	SLW	0.4	Review/edit proposed MOU to circulate to defense counsel preliminary to mediation
12/22/2023	DJB	2.5	Revised MOU
12/22/2023	JBM	0.2	Email and office conference with DJB regarding same
12/22/2023	JBM	0.2	Follow up email and office conference with DJB regarding same
12/22/2023	JBM	0.2	Save documents to case file
12/22/2023	JBM	0.7	Further editing of MOU and draft cover email to defense counsel
12/22/2023	JBM	1	Perform further legal research [REDACTED]
12/22/2023	JBM	1	Review DJB edits to MOU and revise and edit same
12/22/2023	JBM	1	Follow up and review of additional case law regarding term sheets
12/22/2023	SLW	0.3	Executing mediation agreement, forwarding to mediator Scheinman, and review J. Krause order granting parties' joint application for stay pending mediation
12/22/2023	TP	1.2	Review of draft MOU and attention to caselaw research from DJB re [REDACTED]
12/28/2023	EDR	0.3	Correspondence with data scientist regarding time series model
12/29/2023	EDR	0.2	Correspondence with client regarding document collection
1/2/2024	EDR	0.3	Correspondence regarding damages model
1/3/2024	EDR	0.3	Correspondence with expert regarding damages model
1/3/2024	EDR	0.6	Review documents
1/5/2024	EDR	0.2	Organize call re damages report
1/5/2024	JBM	0.2	Office conference with TP regarding settlement strategy
1/5/2024	JBM	0.2	Office conference with EDR regarding damages model and attention to email from M. Officer regarding same
1/5/2024	TP	0.2	Call with JBM regarding mediation strategy
1/8/2024	EDR	0.2	Call with S. Wittels regarding damages model
1/8/2024	EDR	1.1	Call with consultant regarding damages model
1/8/2024	JBM	0.2	Attention to email re settlement issues
1/8/2024	JBM	0.2	Attention to email re settlement issues
1/8/2024	SLW	1.3	Conferring with both experts Darren Hutchinson and Professor Micah regarding strategies and damages for mediation
1/9/2024	JBM	0.2	Office conference with SLW re issues with potential returns
1/10/2024	EDR	0.3	Coordinate strategy call and data call



Date	Atty	Time	Description
1/10/2024	EDR	0.5	Conference with B. McInturff and T. Palikovic regarding redemption of 10-cent fees
1/10/2024	JBM	0.2	Office conference with TP regarding same
1/10/2024	JBM	0.5	Follow up office conference with TP and EDR regarding same and email to SLW re update on return of mother carton issues
1/10/2024	JBM	1	Review and analysis of email correspondence with D. Hutchison re return of mother cartons
1/10/2024	SLW	0.4	Addressing mediation locale and damages issues and strategy
1/10/2024	TP	0.2	Conference with JBM regarding data analysis results
1/10/2024	TP	0.5	Conference with JBM and EDR regarding data analysis of .10c redemptions
1/11/2024	EDR	0.2	Prepare for call with data scientist
1/11/2024	EDR	1.2	Call with data scientist regarding redemptions
1/11/2024	SLW	0.7	Participate in on conference call with expert Daren Hutchison/Hexabyte regarding damages analysis
1/11/2024	TP	1.3	Prepare for and call with D. Hutchison and EDR re data analysis of redemptions
1/11/2024	TP	2.7	Reviewing results of D. Hutchison data analysis and preparing memo outlining same and drafting follow up queries and clarifications
1/12/2024	SLW	0.3	Confer with [REDACTED]
1/12/2024	SLW	0.7	Updating [REDACTED]
1/15/2024	JBM	0.2	Organize case file
1/16/2024	JBM	0.2	Office conference with EDR regarding damages issues
1/16/2024	SLW	0.4	Review Professor Micah's analysis issues regarding estimated damages
1/17/2024	EDR	3.3	Document review
1/19/2024	EDR	0.7	Coordination for damages model
1/20/2024	SLW	0.3	Review preliminary analysis of refunds and redemptions by expert Darren H/Hexabyte
1/21/2024	JBM	0.2	Save documents to case file and update task list
1/22/2024	EDR	2.1	Review and revise damages model
1/22/2024	JBM	0.2	Preliminary review and analysis of defense counsel edits to draft MOU
1/22/2024	JBM	0.2	Office conference with EDR regarding same
1/22/2024	JBM	0.2	Office conference with TP and EDR regarding calculating interest compounding
1/22/2024	NAR	1.1	Research statutory interest issues and discuss same with EDR
1/22/2024	SLW	0.7	Upon receipt from defense counsel Ripin of Manhattan Beer's comments and edits to proposed MOU to be agreed before mediation, review, and analysis thereof
1/22/2024	TP	0.2	Conference with JBM and EDR re interest calculation
1/22/2024	TP	1.8	Review of D. Hutchison answers to some of the 1/11 clarification question and developing further queries re same
1/23/2024	EDR	0.5	Call with S. Wittels regarding damages model



Date	Atty	Time	Description
1/23/2024	EDR	1.6	Revise damages model
1/23/2024	EDR	1.8	Research damages under RICO
1/23/2024	EDR	2.9	Research damages under GBL 349
1/23/2024	JBM	0.2	Office conference with EDR to discuss mediation strategy
1/23/2024	JBM	0.2	Attention to email correspondence from SLW regarding mediation
1/23/2024	JBM	0.2	Follow up office conference with EDR to discuss damages model
1/23/2024	JBM	0.2	Telephone conference with EDR and SLW re settlement strategy
1/23/2024	SLW	0.3	Review updated Hexabyte preliminary damages analysis including re returns and empties
1/23/2024	SLW	0.4	Communicating with team Re [REDACTED]
1/23/2024	TP	0.8	Attention to Pls' class-wide damages model
1/23/2024	TP	1.1	Review of D. Hutchison answers to additional 1/11 clarification questions and developing further queries re same
1/24/2024	EDR	2	Finalize and serve damages model
1/24/2024	SLW	0.6	Review of further preliminary analysis by Hexabyte of damages modeling involving deposits and refunds
1/25/2024	EDR	2.1	Draft mediation statement
1/25/2024	JBM	0.2	Office conference with TP regarding mediation strategy
1/25/2024	JBM	0.2	Office conference with EDR regarding mediation strategy and logistics
1/25/2024	JBM	0.2	Attention to email from defense counsel re damages model and office conferences with EDR and TP in connection with same
1/25/2024	JBM	0.2	Attention to scheduling matters
1/25/2024	JBM	0.7	Continued review of defendant edits to MOU
1/25/2024	JBM	2.2	Perform legal and internet research on release issues
1/25/2024	SLW	0.1	Review communication from defense counsel Eric P requesting meet and confer to discuss plaintiffs' damages model
1/26/2024	EDR	0.5	Call with defense counsel regarding mediation
1/26/2024	EDR	4	Draft background section of mediation statement
1/26/2024	EDR	1.4	Research for mediation statement
1/26/2024	JBM	0.2	Prepare for meet and confer and review damages model in connection with same
1/26/2024	JBM	0.2	Attend meet and confer regarding settlement issues
1/26/2024	JBM	0.2	Office conference with SLW, EDR, and TP regarding same
1/26/2024	JBM	0.5	Office conference with EDR regarding same
1/26/2024	JBM	2.2	Perform legal and internet research on class certification issues raised by defense counsel in meet and confer
1/26/2024	NAR	0.2	Call with JBM re research question
1/26/2024	SLW	0.4	Participating on meet and confer with defense counsel concerning damages and mediation
1/26/2024	TP	0.2	Meet and confer with defense counsel regarding settlement
1/26/2024	TP	0.2	Conference with JBM and SLW regarding same
1/29/2024	EDR	4.8	Draft damages section of mediation statement



Date	Atty	Time	Description
1/29/2024	JBM	0.7	Review email correspondence regarding travel matters and book travel for mediation
1/29/2024	NAR	0.5	Research liquor insurance laws
1/29/2024	SLW	1.4	Review of Dr Micah's preliminary damages analysis, and conferring with the EDR regarding strategy for mediation brief
1/30/2024	DJB	0.4	Call with EDR and JBM re MOU
1/30/2024	EDR	1.7	Draft mediation statement
1/30/2024	JBM	0.2	Office conference with EDR and DJB regarding same
1/30/2024	JBM	0.2	Telephone call with SLW regarding same
1/30/2024	JBM	0.2	Further review and editing of MOU and assemble documents to transmit to Defendant regarding proposed edits to MOU
1/30/2024	JBM	0.2	Attention to scheduling emails with defense counsel
1/30/2024	JBM	0.5	Review case file and prior settlement agreements in connection with same
1/30/2024	JBM	0.7	Further review and analysis of MOU edits and revise and edit same
1/31/2024	JBM	0.2	Call with SLW regarding settlement issues
1/31/2024	JBM	0.2	Attend and lead settlement call with defense counsel
1/31/2024	JBM	0.2	Call with SLW in connection with same
1/31/2024	JBM	0.7	Prepare for call with defense counsel re MOU
1/31/2024	JBM	0.7	Office conference with TP regarding Manhattan Beer strategy
1/31/2024	SLW	0.6	Received call from defense counsel Larry Hutcher regarding mediation and competing strategies, and relating results to team
1/31/2024	TP	0.7	Conference with JBM regarding settlement strategy
2/1/2024	EDR	0.5	Calls with S. Wittels regarding mediation statement
2/1/2024	EDR	0.7	Revise, finalize and submit mediation statement
2/1/2024	EDR	1.2	Draft mediation statement
2/1/2024	JBM	0.2	Office conference with TP regarding mediation statement
2/1/2024	JBM	0.2	Telephone conference with SLW and EDR regarding mediation briefing strategy
2/1/2024	JBM	0.2	Telephone call with TP regarding same
2/1/2024	JBM	0.2	Attention to mediation-related correspondence
2/1/2024	JBM	0.2	Revise and edit same
2/1/2024	JBM	0.2	Draft cover email to defendant enclosing revised MOU
2/1/2024	JBM	0.5	Review and analysis of MB mediation statement
2/1/2024	JBM	0.5	Review Plaintiffs' mediation statement
2/1/2024	JBM	0.5	Review and analysis of Defendant's revised MOU
2/1/2024	SLW	1.5	Review and edit plaintiffs' mediation statement for submission to Mediator Scheinman
2/1/2024	TP	0.3	Follow up internal correspondence regarding revisions to mediation statement
2/1/2024	TP	0.4	Conferences with JBM regarding settlement strategy and mediation statement
2/1/2024	TP	0.8	Reviewing and revising cleaned up drafts of same
2/1/2024	TP	1.9	Review and revise EDR draft of mediation statement and internal correspondence re same



Date	Atty	Time	Description
2/2/2024	EDR	2.1	Draft talking points for mediation
2/2/2024	JBM	0.2	Attention to emails from team regarding revised MOU draft
2/2/2024	JBM	0.2	Review MOU redline and edit cover email to defense counsel and transmit same
2/2/2024	JBM	0.5	Office conference with EDR regarding mediator bullet points to give to mediator at mediation
2/2/2024	SLW	0.1	Communicating with team re confirmation from previous day of call w- Larry Hatcher and his team's authority to mediate case
2/2/2024	SLW	0.1	Communicating with mediator's office regarding conduct of mediation
2/2/2024	SLW	0.3	Review and accept nearly all final changes to MOU draft received from defendants
2/2/2024	SLW	1.2	Upon receipt of defendants' mediation statement, review and analysis thereof
2/2/2024	TP	0.4	Review of and internal correspondence regarding draft MOU
2/5/2024	EDR	1.4	Draft talking points for mediation
2/5/2024	JBM	0.2	Office conference with TP and EDR regarding same
2/5/2024	JBM	0.2	Email correspondence with TP and EDR regarding mediation strategy
2/5/2024	JBM	0.7	Review and edit EDR draft of mediation summary for mediator
2/5/2024	JBM	1	Review and edit EDR pre-mediation talking points
2/5/2024	JBM	2	Perform legal an internet research of [REDACTED]
2/5/2024	SLW	0.7	Review further updated damages analysis, including refund/redemption data by Darren Hutchinson/Hexabyte
2/5/2024	SLW	0.9	Confer with Larry Hatcher new lead defense counsel regarding mediation and potential resolution of all outstanding matters, research assertions conveyed by defense counsel, and relay update to WMP team
2/5/2024	TP	0.2	Conference with JBM and EDR regarding mediation strategy and talking points
2/5/2024	TP	0.5	Review of and revision to mediator executive summary
2/5/2024	TP	1.2	Attention to D. Hutchison velocity analysis and outlining follow up questions regarding same
2/6/2024	EDR	2.8	Draft memo regarding redemptions in transaction data
2/6/2024	EDR	1.6	Legal research for redemptions in transaction data
2/6/2024	JBM	0.2	Office conference with EDR regarding same
2/6/2024	JBM	0.2	Office conference with SLW to discuss settlement demands and logistics
2/6/2024	JBM	0.2	Follow up office conference with EDR regarding same
2/6/2024	JBM	0.2	Further attention to emails regarding mediation
2/6/2024	JBM	0.2	Review and analyze defense counsel's email regarding MOU
2/6/2024	JBM	0.2	Draft email response to TP, SLW, and EDR regarding same
2/6/2024	JBM	0.2	Attention to SLW comments to defense counsel's email regarding MOU
2/6/2024	JBM	0.2	Email correspondence with mediator in connection with same



Date	Atty	Time	Description
2/6/2024	JBM	0.7	Review and analyze SLW edits to mediator's executive summary and update and finalize same
2/6/2024	JBM	0.7	Edit and finalize executive summary to mediator
2/6/2024	JBM	1	Review and edit SLW edits to mediator bullet points
2/6/2024	SLW	0.9	Review and edit executive summary for Mediator Scheinman
2/6/2024	TP	0.4	Attention to EDR memo regarding D. Hutchison return/redemption analysis
2/6/2024	TP	0.6	Review of SLW revisions to mediator executive summary and internal correspondence regarding same
2/6/2024	TP	0.7	Review of defense counsel response re MOU and internal correspondence w SLW and JBM re same
2/7/2024	EDR	1.4	Prepare for mediation
2/7/2024	EDR	7.5	Travel for mediation
2/7/2024	JBM	6	Travel from Brooklyn to Miami for mediation
2/7/2024	SLW	0.7	Communicating with Named Plaintiffs Village Social and Cap 111/ Connie Petrovich [REDACTED]
2/7/2024	SLW	1.3	Preparing for mediation on Thursday, February 8 including researching updated case law re GBL 349 and RICO, and preparing settlement demand and presentation for Mediator
2/7/2024	TP	1.4	Preparing for mediation
2/8/2024	EDR	0.8	Prepare for mediation
2/8/2024	EDR	8	Attend mediation
2/8/2024	JBM	6	Travel from Miami to Brooklyn from mediation
2/8/2024	JBM	10	Prepare for and attend mediation
2/8/2024	SLW	8.5	Attending all-day mediation before Mediator Scheinman in Aventura Florida
2/8/2024	TP	3.2	Travel to and from mediation
2/8/2024	TP	8.6	Prepare for and attend mediation
2/9/2024	EDR	7	Travel from mediation
2/9/2024	JBM	0.2	Telephone calls with SLW to discuss settlement
2/9/2024	JBM	0.2	Office conference with NAR regarding Manhattan Beer settlement
2/10/2024	SLW	0.3	Communicating with both sets of named plaintiffs regarding [REDACTED]
2/12/2024	EDR	0.6	Document review
2/12/2024	EDR	0.9	Draft letter regarding mediation
2/12/2024	JBM	0.2	Office conference with EDR regarding status update
2/12/2024	JBM	0.2	Call with SLW re Manhattan beer mediation strategy
2/12/2024	JBM	0.2	Attention to letter from EDR re status update
2/12/2024	TP	0.5	Attention to draft letter to court re mediation report and internal correspondence re same
2/13/2024	EDR	0.3	Finalize and file letter regarding mediation
2/13/2024	EDR	0.5	Draft proposed case schedule
2/13/2024	JBM	0.2	Attention to correspondence from defense counsel re status update and EDR email re same



Date	Atty	Time	Description
2/13/2024	JBM	0.2	Attention to email from SLW and response to same
2/13/2024	JBM	0.2	Follow up office conferences with EDR regarding proposed schedule
2/13/2024	JBM	0.2	Draft email to defense counsel re delay in providing revised schedule to court
2/13/2024	JBM	0.2	Attention to defendant response and respond to same
2/13/2024	JBM	0.2	Correspondence with EDR regarding status letter
2/13/2024	SLW	0.4	Review and edit of status report to Judge Krause re result of mediation, and review defense proposed changes to letter
2/15/2024	EDR	0.2	Email to defense counsel regarding 5th RFPs and document production
2/15/2024	JBM	0.2	Telephone call with EDR and SLW regarding settlement and litigation strategy
2/16/2024	EDR	0.2	Call with B. McInturff regarding settlement strategy
2/16/2024	EDR	0.3	Prepare document production
2/16/2024	JBM	0.2	Office conference with EDR re litigation and settlement strategy
2/16/2024	JBM	0.2	Follow up office conference with EDR regarding settlement strategy
2/16/2024	SLW	0.3	In light of unsuccessful mediation, conferring with EDR and JBM regarding motion strategy, and next steps on class motion and damages, as well as obtaining ESI from Defendants per earlier commitments by defense counsel
2/20/2024	EDR	0.4	Prepare for meet and confer
2/20/2024	EDR	0.4	Meet and confer regarding discovery schedule
2/20/2024	EDR	0.7	Draft revised scheduling order and letter to Court
2/20/2024	SLW	0.9	Conferring with EDR in advance of meet and confer, then conferring with Eric P defense counsel and Peter R regarding scheduling order for submission to court
2/21/2024	EDR	0.2	Conference with B. McInturff regarding schedule and case strategy
2/21/2024	EDR	0.2	Correspondence with defense counsel regarding proposed schedule
2/21/2024	EDR	0.3	Conference with S. Wittels regarding schedule and case strategy
2/21/2024	EDR	0.9	Revise and file proposed schedule
2/21/2024	JBM	0.2	Office conference with EDR regarding case scheduling
2/23/2024	EDR	0.2	Call with B. McInturff and S. Wittels regarding settlement
2/23/2024	JBM	0.2	Office conference with EDR re settlement
2/23/2024	JBM	0.2	Telephone conference with SLW and EDR re mediation
2/23/2024	JBM	0.2	Conference with mediator regarding settlement status
2/26/2024	EDR	1.1	Respond to email from defense counsel regarding discovery scheduling
2/27/2024	EDR	0.1	Call with SLW regarding settlement strategy and document production
2/29/2024	JBM	0.2	Call with settlement administrator Angeion
2/29/2024	JBM	0.2	Call with settlement administrator ACS
3/1/2024	EDR	1.5	Update discovery digest
3/1/2024	JBM	0.2	Office and telephone conference with DJB re research on class counsel conflict issues



Date	Atty	Time	Description
3/1/2024	JBM	0.2	Telephone call with SLW re mediation issues and reaching out to lead defense counsel Hutcher
3/4/2024	DJB	3	Researched adequacy of counsel and potential conflicts
3/5/2024	JBM	0.2	Office conference with EDR re to dos
3/5/2024	JBM	0.2	Office conference with TP regarding settlement matters
3/5/2024	JBM	0.2	Follow up office conference with TP regarding same
3/5/2024	JBM	0.2	Telephone call with SLW regarding settlement strategy
3/5/2024	TP	0.5	Multiple conferences with JBM regarding settlement issues
3/7/2024	DJB	2.6	Researched adequacy of counsel and potential conflicts
3/7/2024	EDR	0.2	Call with JBM regarding settlement
3/7/2024	EDR	0.2	Call with JMB regarding response to defense counsel email on exemplar invoice production
3/7/2024	EDR	0.3	Call with D. Hutchinson regarding data analysis for settlement
3/7/2024	EDR	0.3	Draft email to D. Hutchinson regarding data analysis for settlement
3/7/2024	EDR	0.3	Coordinate production of additional exemplar invoices
3/7/2024	EDR	0.6	Review and analyze exemplar invoice production
3/7/2024	EDR	1.6	Draft response to defense counsel email regarding exemplar invoice production
3/7/2024	JBM	0.2	Office conference with EDR re status of discovery and planning for class certification motion
3/7/2024	JBM	0.2	Telephone call with SLW re settlement planning
3/7/2024	JBM	0.2	Follow up call with SLW and L. Hutcher re settlement issues
3/7/2024	JBM	0.2	Attention to DJB email analysis of same
3/7/2024	JBM	0.2	Follow up call with SLW in connection with same
3/7/2024	JBM	0.2	Office conference with EDR re settlement discussions
3/7/2024	JBM	0.5	Office conferences with DJB in connection with potential settlement structures
3/7/2024	JBM	0.5	Calls with S. Weisbrot re settlement administration matters
3/7/2024	JBM	0.5	Review documents in connection with same
3/7/2024	SLW	0.7	Preparing for and attending telephone conference with defense counsel Larry Hutcher together with JBM regarding proposed settlement issues
3/8/2024	DJB	1.1	Researched adequacy of counsel and potential conflicts
3/8/2024	DJB	1.2	Researched claims made settlements
3/9/2024	JBM	0.5	Review damages analysis and prior research in connection with same
3/9/2024	JBM	0.7	Attention to D. Hutchinson analysis of settlement parameters and analysis of same
3/11/2024	EDR	0.2	Call with JBM regarding meet and confer
3/11/2024	EDR	0.4	Review and analyze collected invoices
3/11/2024	EDR	0.5	Meet and confer with defense counsel
3/11/2024	EDR	0.9	Prepare for meet and confer
3/11/2024	JBM	0.2	Office conference with TP, EDR and D. Hutchinson re damages analysis
3/11/2024	JBM	0.2	Call with settlement administrator



Date	Atty	Time	Description
3/11/2024	JBM	0.2	Follow up office conference with JLH regarding same
3/11/2024	JBM	0.2	Call with SLW re settlement strategy
3/11/2024	JBM	0.2	Office conference with EDR re Manhattan beer production
3/11/2024	JBM	0.5	Office conference with TP regarding damages analysis
3/11/2024	JBM	0.5	Review and analysis of MB privilege log
3/11/2024	TP	0.2	Conference with D. Hutchison and JBM re damages calculation
3/11/2024	TP	0.4	Drafting internal correspondence regarding economic damages
3/11/2024	TP	0.4	Conference with JBM regarding data analysis issues in connection with settlement
3/11/2024	TP	2.1	Review and analysis of damages methodology
3/12/2024	JBM	0.2	Call with D. Hutchinson in connection with same
3/12/2024	JBM	0.2	Call with TP regarding same
3/12/2024	JBM	0.2	Call with SLW regarding same
3/12/2024	JBM	0.2	Email correspondence with defense counsel re settlement and outreach to potential settlement administrator in connection with same
3/12/2024	JBM	0.5	Follow up review of D. Hutchinson analysis
3/12/2024	JBM	0.7	Attention to settlement analysis from D. Hutchinson
3/12/2024	TP	0.2	Conference with JBM regarding damages analysis
3/12/2024	TP	0.6	Review of D. Hutchison data analysis
3/13/2024	EDR	0.9	Review and analyze ESI for exemplar invoices
3/13/2024	JBM	0.2	Prepare outline of issues to discuss with TP and SLW re settlement
3/13/2024	JBM	0.2	Call with D. Hutchinson re settlement issues and email with D. Hutchinson re same
3/13/2024	JBM	0.2	Telephone call with settlement administrator
3/13/2024	JBM	0.5	Follow up call with TP regarding damages calculations
3/13/2024	JBM	0.7	Office conference with TP regarding settlement matters
3/13/2024	JBM	0.7	Telephone call with SLW re settlement matters
3/13/2024	JBM	1	Attention to and analysis of D. Hutchinson updated analysis of settlement data
3/13/2024	JBM	1.2	Further review and analysis of D. Hutchinson settlement data
3/13/2024	TP	0.5	Conference with JBM regarding data analysis and damages calculation
3/13/2024	TP	0.7	Conference with JBM regarding settlement issues and tasks
3/13/2024	TP	1.2	Review and analysis of D. Hutchison damages calculations
3/14/2024	DJB	2.6	Research on pre-judgment interest
3/14/2024	EDR	0.1	Call with JBM regarding discovery and exemplar invoices
3/14/2024	JBM	0.2	Telephone call with settlement administrator C. Peak
3/14/2024	JBM	0.2	Telephone call with K. Bollman re settlement issues
3/14/2024	JBM	0.2	Telephone call with C. Tucci settlement admin
3/14/2024	JBM	0.2	Telephone conference with DJB in connection with same
3/14/2024	JBM	0.2	Telephone call with SLW regarding settlement matters
3/14/2024	JBM	0.2	Telephone call with S. Weisbrott settlement admin
3/14/2024	JBM	0.2	Call with P. Ripin re settlement matters



Date	Atty	Time	Description
3/14/2024	JBM	0.7	Perform legal research on [REDACTED]
3/15/2024	EDR	0.1	Call with JBM regarding Defendants' document production
3/15/2024	EDR	0.1	Call with JBM regarding response to Defendants' request for exemplar invoice production
3/15/2024	EDR	0.2	Calls with client regarding search for exemplar invoices
3/15/2024	EDR	0.5	Email correspondence with defense counsel regarding exemplar invoice production
3/15/2024	JBM	0.2	Office conference with EDR regarding additional search of client files
3/15/2024	JBM	0.2	Follow up office conference with EDR regarding same
3/15/2024	JBM	0.2	Review and redline EDR email to defense counsel re search for other vendor invoices and office conference with EDR in connection with same
3/15/2024	JBM	0.2	Call with D. Hutchinson re data analysis
3/15/2024	JBM	0.2	Review revised D. Hutchinson data analysis and call with D. Hutchinson regarding same
3/15/2024	JBM	1.5	Further review and analysis of D. Hutchinson analysis and prepare notes for call with same
3/16/2024	JBM	0.5	Review and analysis if DJB research on pre-judgment interest in state court
3/16/2024	JBM	1.2	Attention to and analysis of D. Hutchinson analysis of damages and outline arguments regarding same
3/18/2024	EDR	0.2	Email defense counsel regarding meet and confer
3/18/2024	EDR	0.8	Review and analyze responses to 5th RFPs
3/18/2024	EDR	3.9	Document review
3/18/2024	JBM	0.2	Attention to correspondence with claims administrators
3/18/2024	JBM	0.2	Call with SLW re settlement issues
3/18/2024	JBM	0.2	Call with opposing counsel re document production issues and settlement
3/18/2024	JBM	0.2	Follow up office conference with EDR regarding same
3/18/2024	JBM	0.2	Telephone call with SLW re settlement analysis
3/18/2024	JBM	0.2	Email correspondence with B. Kleiner
3/18/2024	JBM	0.2	Office conference with EDR in connection with same
3/18/2024	JBM	0.2	Email correspondence with D. Forrest in connection with same
3/18/2024	JBM	0.2	Telephone call with SLW re notice issues
3/18/2024	JBM	0.2	Review J. Krause discovery order in connection with discovery disputes and email with EDR regarding scheduling matters
3/18/2024	JBM	0.2	Communications with D. Hutchinson re settlement issues
3/18/2024	JBM	0.2	Email correspondence with D. Forrest re Defendants' ESI production
3/18/2024	JBM	0.5	Office conference with B. Kleiner re settlement administration
3/18/2024	JBM	0.5	Office conference with C. Peak re settlement administration
3/18/2024	JBM	0.5	Telephone call with A. Palmer and B. Kleiner re settlement administration
3/18/2024	JBM	0.7	Further analysis of D. Hutchinson analysis



Date	Atty	Time	Description
3/18/2024	JBM	0.7	Review and analysis of FTC 2019 study of claims rates in consumer settlements
3/18/2024	JBM	0.7	Locate and review template documents to use in motion practice
3/18/2024	JBM	2.2	Perform legal research on remedies for inadequate document production including overly restrictive relevancy designations and review and analyze case law in connection with same
3/19/2024	DJB	2.2	Research on Rule 23 adequacy issues
3/19/2024	EDR	0.2	Call with defense counsel regarding court conference
3/19/2024	EDR	0.6	Attend court conference
3/19/2024	EDR	0.6	Call with D. Forrest regarding defendants' production and ways to challenge sufficiency
3/19/2024	EDR	2.9	Review and analyze correspondence regarding ESI disclosures
3/19/2024	JBM	0.2	Office conference with EDR re Defendant's ESI source disclosures and potential motion for revised disclosures
3/19/2024	JBM	0.2	Follow up office conference with EDR in connection with same
3/19/2024	JBM	0.2	Call with defense counsel re scheduling issues and settlement matters
3/19/2024	JBM	0.2	Follow up office conference with EDR regarding same
3/19/2024	JBM	0.5	Call with D. Forrest regarding options for addressing deficient document productions
3/19/2024	JBM	0.5	Attend telephonic conference with court
3/19/2024	NAR	0.2	Order transcript
3/19/2024	SLW	1.9	Prepare for and attend status conference before Judge Krause re new deadlines and outstanding discovery issues
3/20/2024	EDR	2.7	Search for exemplar invoices
3/20/2024	EDR	4.3	Travel to search for exemplar invoices
3/20/2024	JBM	0.2	Telephone conference with SLW regarding potential counter-offer
3/20/2024	JBM	0.2	Office conference with EDR regarding [REDACTED]
3/20/2024	JBM	0.7	Further analysis of D. Hutchinson updated data and correspondence with settlement administrator in connection with same
3/20/2024	JBM	1	Analysis of D. Hutchinson updated data
3/20/2024	SLW	0.9	Review damages and liability issues, confer with JBM re potential damages, and communicate with Mediator Scheinman
3/21/2024	EDR	0.3	Send documents to vendor for production
3/21/2024	JBM	0.5	Meet with settlement administrator re potential settlement terms
3/21/2024	JBM	0.7	Internet research on settlement distribution methods
3/22/2024	JBM	0.2	Attention to correspondence from settlement administrator regarding administration security
3/22/2024	JBM	0.2	Call with D. Hutchinson in connection with same
3/22/2024	JBM	0.2	Follow up call with D. Hutchinson
3/22/2024	JBM	0.5	Attention to D. Hutchinson analysis re damages
3/22/2024	JBM	0.5	Telephone conference with SLW regarding settlement demand and review of correspondence with mediator
3/22/2024	JBM	0.5	Further analysis of D. Hutchinson data



Date	Atty	Time	Description
3/22/2024	NAR	0.1	Emails with reporter re transcript
3/22/2024	SLW	0.2	Upon receipt of email from Mediator Scheinman, communicate with team regarding strategy
3/23/2024	TP	0.2	Attention to J. Krause order re discovery (ECF 60)
3/24/2024	JBM	0.2	Telephone call with SLW re potential revised settlement demand
3/24/2024	JBM	0.2	Follow up telephone call with SLW re settlement matters
3/24/2024	SLW	0.1	Confer with JBM regarding settlement strategy
3/24/2024	SLW	0.3	Prepare updated strategy assessment
3/25/2024	JBM	0.2	Telephone call with settlement administrator
3/25/2024	JBM	0.2	Follow up call with SLW regarding revised settlement demand
3/26/2024	EDR	0.4	Produce documents
3/27/2024	EDR	0.1	Chat with JLH regarding document production
3/27/2024	JBM	0.2	Office conference with EDR regarding deficiencies in D's production
3/27/2024	JBM	0.5	Office conference with JLH regarding recall testing and review documents in connection with same
3/27/2024	JLH	0.1	Reviewing file re states on Defendant's document production
3/27/2024	JLH	0.1	Correspondence with EDR re extent of Defendant's document production, method, etc.
3/27/2024	JLH	0.3	Call w JBM re assignment on recall testing, etc. of Defendant's collection and production
3/27/2024	JLH	1.2	Reading background materials on e-discovery recall, elusion, etc.
3/27/2024	SLW	0.3	Communicating with Mediator Scheinman regarding status of negotiations and potential resolution
3/28/2024	EDR	0.2	Call with JLH regarding defendants' document production
3/28/2024	JLH	0.1	Call w EDR on search term validation etc.
3/28/2024	JLH	0.2	Call w JBM re work product for email to defense counsel re search term validation
3/28/2024	JLH	0.4	Draft and send email to plaintiffs' list serv re sample search term validation protocols
3/28/2024	JLH	0.8	Reviewing [REDACTED]
3/28/2024	JLH	1.5	Reviewing additional background materials on review validation calculations
3/29/2024	EDR	0.4	Call with JBM regarding deficiency email
3/29/2024	EDR	0.9	Revise and send deficiency email
3/29/2024	EDR	2.8	Draft email regarding document production deficiencies and needed disclosures
3/29/2024	JBM	0.2	Attention to email contact [REDACTED]
3/29/2024	JBM	0.2	Office conference with EDR regarding deficiencies in Manhattan Beer's collection and review of documents
3/29/2024	JBM	0.2	Telephones call with SLW regarding settlement matters
3/29/2024	JLH	1.2	Drafting paragraph re validation sampling protocol
4/1/2024	NAR	0.2	Order transcript
4/1/2024	NAR	0.2	Save and circulate transcript



Date	Atty	Time	Description
4/8/2024	EDR	0.2	Call with JBM regarding meet and confer
4/8/2024	EDR	1.1	Meet and confer with defense counsel regarding 5th RFPs, production deficiencies
4/8/2024	JBM	0.2	Office conference with EDR in connection with same
4/8/2024	JBM	0.2	Follow up office conference with EDR in connection with same
4/8/2024	JBM	1	Review documents and case law in preparation for meet and confer with defense counsel regarding deficiencies in document production
4/8/2024	JBM	1	Attend meet and confer with defense counsel
4/9/2024	EDR	0.2	Call with JBM regarding class certification, production deficiencies
4/9/2024	EDR	1.2	Draft talking points regarding production deficiencies for meet and confer
4/9/2024	EDR	2.4	Review and analyze documents for potential custodians
4/9/2024	JBM	0.2	Office conference with EDR regarding same
4/9/2024	JBM	0.2	Telephone call with settlement administrator regarding same
4/9/2024	JBM	0.2	Telephone call with SLW regarding settlement strategy
4/9/2024	JBM	0.2	Office conference with TP to preview research topics
4/9/2024	JBM	0.5	Review and analysis of email from defense counsel recapping meet and confer and outline potential responses regarding same
4/9/2024	TP	0.2	Conference with JBM regarding research tasks re discovery deficiencies
4/9/2024	TP	1.7	Research re improper/coercive contact with potential class members
4/10/2024	DJB	0.2	Call with TP re Defendant's declarations
4/10/2024	EDR	0.4	Draft email regarding 4.8 meet and confer
4/10/2024	EDR	0.5	Call with JBM regarding meet and confer on production deficiencies
4/10/2024	EDR	0.6	Prepare for meet and confer on production deficiencies
4/10/2024	EDR	1.4	Update discovery digest
4/10/2024	JBM	0.2	Outline TP to dos
4/10/2024	JBM	0.2	Office conference with EDR regarding same
4/10/2024	JBM	0.2	Draft email following same outlining to dos
4/10/2024	JBM	0.2	Attention to email correspondence with SLW and L. Hutcher regarding settlement lunch meeting
4/10/2024	JBM	0.2	Office conference with TP regarding case assignments
4/10/2024	JBM	0.5	Office conference with EDR re preparing for meet and confer
4/10/2024	JBM	0.7	Office conference with TP to go over to dos
4/10/2024	JBM	1.2	Perform legal research into coercive contact with potential class members and email to TP in connection with same
4/10/2024	SLW	0.1	Communicating with Larry Hutcher regarding potential direct settlement meeting
4/10/2024	TP	0.2	Reviewing correspondence re MB declarations from customers
4/10/2024	TP	0.2	Conference with EDR regarding Defendants' potentially improper contact of class members
4/10/2024	TP	0.7	Conference with JBM regarding settlement and discovery tasks
4/10/2024	TP	0.8	Conference with DJB and drafting overview email of issues and research tasks regarding MB's improper contact with class members



Date	Atty	Time	Description
4/10/2024	TP	1.1	Attention to correspondence with defense counsel in connection with upcoming research tasks re discovery deficiencies
4/11/2024	EDR	0.7	Prepare for meet and confer on production deficiencies, custodians
4/11/2024	EDR	1	Meet and confer with defense counsel on production deficiencies, custodians
4/11/2024	EDR	3.2	Draft and send email to defense counsel regarding April 8 and 10 meet and confers
4/11/2024	JBM	0.2	Office conference with EDR in connection with same
4/11/2024	JBM	0.2	Follow up conference with EDR regarding meet and confer
4/11/2024	JBM	0.2	Organize case-related email correspondence
4/11/2024	JBM	1	Prepare for meet and confer
4/11/2024	JBM	1	Attend meet and confer
4/11/2024	JLH	0.1	Gathering sample deficiency letters re defense R+Os; related email to T. Palikovic
4/11/2024	SLW	0.1	Further communication with Larry Hucher regarding settlement meeting
4/11/2024	TP	0.2	Conference with JBM and EDR re customer declarations strategy
4/11/2024	TP	0.7	Attention to Defendants' privilege log and drafting email with research tasks re same to DJB
4/12/2024	DJB	2	Research on contacting absent class members
4/12/2024	JBM	0.2	Telephone call with SLW regarding settlement scenarios
4/12/2024	JBM	0.5	Calls to C. Tucci re settlement administration
4/12/2024	JBM	0.7	Follow up analysis of same
4/12/2024	JBM	1	Perform analysis on settlement scenarios
4/12/2024	SLW	0.1	Conferring with JBM regarding strategy for meeting with Larry Hucher
4/12/2024	SLW	0.7	Modeling damages and strategy for potential renewed settlement talks
4/15/2024	DJB	4.4	Researched defendant's contacts with putative class members, made notes re same
4/15/2024	JBM	0.2	Save documents to case file
4/15/2024	JBM	0.2	Correspond with potential claims administrator
4/15/2024	JLH	0.3	Review response and case from CLEF list serv re search term validation protocol
4/15/2024	SLW	0.4	Prepare outline for settlement meeting with defense counsel Hucher
4/16/2024	JBM	0.2	Email correspondence with defense counsel in connection with same
4/16/2024	JBM	0.5	Telephone calls with claims administrator
4/16/2024	JBM	0.7	Travel to meeting with defense counsel D. Hucher
4/16/2024	JBM	0.7	Travel from meeting with defense counsel
4/16/2024	JBM	1.7	Meet with defense counsel D. Hucher
4/16/2024	SLW	0.3	Confer with Chris Tucci, settlement administrator, re settlement issues regarding potential settlement



Date	Atty	Time	Description
4/16/2024	SLW	1.2	Final preparation for and participate w- JBM at in-person settlement meeting in NYC with Larry Hutcher
4/16/2024	TP	0.4	Reviewing discovery digest
4/16/2024	TP	0.5	Researching caselaw regarding converting RFPs into interrogatories
4/16/2024	TP	0.6	Reviewing correspondence with defense counsel regarding discovery disputes to date
4/16/2024	TP	2.2	Researching caselaw in opposition to Defendants' argument attempting to impose reciprocal burdens on plaintiffs
4/17/2024	EDR	0.2	Call with JBM, TP regarding issues to raise regarding customer declarations at upcoming conference
4/17/2024	EDR	0.7	Review document production
4/17/2024	JBM	0.7	Review TP research on converting RFPs to Interrogatories and office conference with TP and EDR regarding same
4/17/2024	JBM	1	Review and analysis of TP research on "goose for the gander" and read case law cited therein
4/17/2024	SLW	0.1	Confer with Larry Hutcher regarding certain representation issues
4/17/2024	TP	0.2	Conference with JBM and EDR re customer declarations strategy for court hearing
4/17/2024	TP	0.2	Conference with SLW regarding same
4/17/2024	TP	1.2	Reviewing internal correspondence re prior defense counsel representations in connection with settlement strategy
4/17/2024	TP	1.7	Drafting letter to defense counsel rejecting attempt to impose reciprocal discovery obligations and internal correspondence regarding same
4/17/2024	TP	1.9	Researching caselaw regarding propriety and mechanics of converting RFPs into interrogatories and drafting research memorandum re same
4/17/2024	TP	2.5	Additional research regarding reciprocal obligations in discovery
4/18/2024	EDR	0.5	Email defense counsel regarding converting RFP on declarations into interrogatory
4/19/2024	EDR	0.3	Send information to T. Palikovic regarding defendants' document production
4/19/2024	TP	1.3	Reviewing discovery digest and selected documents from defendants' production
4/19/2024	TP	1.4	Researching caselaw regarding validation testing of search terms and productions
4/22/2024	SLW	0.4	Upon receipt of detailed list from Eric Z of Defendants' responses to numerous discovery deficiencies identified by Plaintiffs in April 11 & 18 deficiency letters, review thereof
4/23/2024	JBM	0.5	Office conference with TP to review task list and to discuss next steps on validation research
4/23/2024	SLW	0.3	Review defendant counsel Eric P's email regarding current disputes on document production
4/23/2024	TP	0.5	Conference with JBM regarding discovery deficiencies research and upcoming tasks



Date	Atty	Time	Description
4/23/2024	TP	1.2	Review documents, prior correspondence with defense counsel and internal file in connection with same
4/23/2024	TP	1.6	Research regarding elusion testing and redlining correspondence regarding same to defense counsel
4/24/2024	SLW	0.1	Communicating with JBM re discovery strategy, and contacting claims administrator re process issues
4/25/2024	EDR	0.1	Call with JBM regarding case strategy
4/29/2024	EDR	0.4	Draft discovery dispute letter
4/29/2024	EDR	1.4	Draft response to email from defense counsel regarding discovery disputes
4/30/2024	EDR	1.5	Draft discovery dispute letter
5/1/2024	EDR	0.4	Review party correspondance for discovery dispute letter
5/1/2024	EDR	1.1	Research for discovery disputes letter
5/1/2024	EDR	4.4	Draft discovery dispute letter
5/1/2024	JBM	0.2	Office conference with NAR regarding class cert motion
5/1/2024	JBM	0.7	Perform final proof of letter, assemble exhibits, and finalize and file letter
5/1/2024	JBM	1	Review prior case filings and transcript and of April 2023 source transparency hearing and EDR proposed exhibits to letter
5/1/2024	JBM	1	Revise and edit letter in connection with same
5/1/2024	JBM	1.7	Further revisions to letter re production deficiencies and office conferences with EDR in connection with same
5/1/2024	JBM	2.5	Revise and edit EDR letter re production deficiencies and office conferences with EDR in connection with same
5/2/2024	JBM	1	Meet with NAR re class certification motion and review documents and discovery digest regarding same
5/2/2024	NAR	0.5	Review discovery digest
5/2/2024	NAR	0.9	Calls with JBM re class cert brief and discovery digest
5/2/2024	SLW	0.1	Conferring with JBM regarding strategy
5/2/2024	SLW	1	Review of competing letters to Judge Krause concerning parties' respective Discovery deficiency letters in preparation for hearing
5/3/2024	EDR	1	Review and analyze defendants' discovery dispute letters
5/3/2024	NAR	2	Review class cert work product and outline motion
5/5/2024	EDR	3.9	Draft opposition to defendants' discovery letters
5/6/2024	EDR	2.2	Revise and file opposition to defendants' discovery letters
5/6/2024	JBM	0.2	Attention to Manhattan Beer letter brief and office conference with EDR in connection with same
5/6/2024	JBM	0.2	Office conference with TP regarding to do list for case
5/6/2024	JBM	0.5	Attention to correspondence from EDR re pre-conference letter response and review ESI protocol and prior case filings in connection with same
5/6/2024	TP	0.3	Conference with JBM regarding upcoming discover y tasks and class cert strategy
5/6/2024	TP	0.8	Reviewing transcript of August conference and defendants' motion to compel in connection with opposition to same



Date	Atty	Time	Description
5/6/2024	TP	1.6	Reviewing and revising EDR draft of opposition to defendants' motion to compel exemplar invoices
5/7/2024	EDR	0.2	Prepare for conference
5/7/2024	JBM	1.2	Assemble documents and prepare for 5/8 conference
5/7/2024	NAR	0.5	Review class cert motion templates
5/7/2024	NAR	1.5	Research re class cert motion
5/7/2024	NAR	2.8	Draft class cert brief
5/8/2024	EDR	4.3	Travel to and from conference re discovery disputes
5/8/2024	EDR	1.7	Attend conference with judge on discovery disputes
5/8/2024	EDR	0.2	Post conference meeting with JBM and SLW
5/8/2024	JBM	0.2	Post conference meeting with EDR and SLW
5/8/2024	JBM	0.5	Meet with SLW and EDR to moot conference arguments
5/8/2024	JBM	0.7	Continued preparation for conference
5/8/2024	JBM	1.5	Travel to conference and prepare for conference with court
5/8/2024	JBM	1.7	Attend conference with judge on discovery disputes
5/8/2024	JBM	1.7	Travel from conference
5/8/2024	NAR	1.2	Research re class cert motion
5/8/2024	NAR	4	Draft class cert brief, reviewed supporting documents and materials, reviewed other class cert motions
5/8/2024	SLW	1.6	Prepare for and appear before Magistrate Judge Krause regarding parties' respective deficiency discovery positions, and confer afterwards with defense counsel Peter R
5/9/2024	NAR	0.9	Research re class cert
5/9/2024	NAR	1	Revisions to class cert motion
5/10/2024	NAR	0.1	Call with EDR re transcript order
5/10/2024	NAR	0.1	Call with JBM re transcript order
5/10/2024	NAR	0.5	Emails re transcript order
5/10/2024	SLW	1.6	Upon receipt from defense counsel Peter Rea or communication stating that defendants will be modifying their invoices to specify the charge for the "mother carton cardboard," will memorialize the charge in both the credit applications and in a separate notice to all customers, review and analysis thereof, as well as claim by defendants' counsel that FRE 407 forbids admissibility at trial, conduct case research into admissibility issue, and confer with team
5/13/2024	EDR	1.8	Send hit report to defense counsel regarding exemplar invoice searches
5/13/2024	JBM	0.2	Office conference with EDR re plan for meet and confer
5/13/2024	JBM	0.2	Office conference with TP regarding mils
5/13/2024	JBM	0.7	Review Rule 26 re listing non searched data sources and related internet research
5/13/2024	NAR	0.1	Email re meet and confer
5/15/2024	JBM	0.2	Office conference with EDR re scheduling matters
5/15/2024	JBM	0.2	Email correspondence with opposing counsel re scheduling issues and correspondence with SLW re settlement matters
5/15/2024	NAR	0.1	Emails re scheduling meet and confer



Date	Atty	Time	Description
5/16/2024	EDR	0.5	Call with JBM, NAR regarding case strategy
5/16/2024	EDR	0.7	Prepare for meet and confer
5/16/2024	EDR	0.9	Meet and confer with defense counsel regarding custodians, production deficiencies
5/16/2024	JBM	0.2	Telephone conference with SLW re settlement issues
5/16/2024	JBM	0.2	Office conference with NAR and EDR re meet and confer topics
5/16/2024	JBM	0.2	Post conferral conference with EDR and NAR
5/16/2024	JBM	0.2	Call to NAR regarding additional follow ups
5/16/2024	JBM	1	Review and analyze transcript from May 10 hearing and outline issues re same
5/16/2024	JBM	1	Attend and lead meet and confer
5/16/2024	NAR	0.3	Call with JBM, EDR re MBeer conferral
5/16/2024	NAR	1	Attend conferral with opposing counsel and circulate notes of same
5/17/2024	JBM	0.2	Correspond with settlement administrator re settlement
5/17/2024	JBM	5	Attention to client correspondence re new invoices and emails with team in connection with same
5/17/2024	NAR	0.3	Emails with JBM re MBeer discovery
5/18/2024	SLW	2.1	In light of Defendants' policy change in invoicing and disclosure regarding cardboard mother carton, conducting further research into [REDACTED] and conferring with team re proposed deposition
5/21/2024	JBM	0.2	Office conference with NAR re post-conferral email
5/21/2024	JBM	0.2	Review and analyze call notes from 5.16.24 meet and confer
5/21/2024	JBM	0.5	Follow up emails and office conferences with NAR in connection with same
5/21/2024	JBM	0.7	Review emails from defense counsel and EDR regarding prior production and office conference with NAR in connection with same
5/21/2024	NAR	0.6	Calls with JBM re discovery strategy
5/22/2024	EDR	0.8	Draft and serve revised privilege log
5/22/2024	EDR	1.2	Revise confirmatory email for meet and confer
5/22/2024	EDR	1.6	Draft and serve 6th RFPs
5/22/2024	EDR	2.4	Review documents from exemplar invoice search
5/22/2024	JBM	0.2	Office conference with EDR regarding discovery deficiencies
5/22/2024	JBM	0.2	Office conference with NAR re post-conferral email
5/22/2024	JBM	0.5	Telephone call with SLW and TP re settlement issues
5/22/2024	JBM	0.5	Follow up office conference with NAR and EDR in connection with response to D claims about scope of requested discovery
5/22/2024	JBM	1	Follow up review of documents and status of discovery in connection with same
5/22/2024	JBM	1.2	Revise and edit post conferral email and review pre-conference submissions and May 10 conference transcript in connection with same
5/22/2024	NAR	0.3	Update calendar



Date	Atty	Time	Description
5/22/2024	NAR	0.5	Revise post-conferral email
5/22/2024	NAR	0.6	Call with JBM and EDR re discovery
5/22/2024	NAR	2	Draft post-conferral email
5/22/2024	SLW	0.6	Conferring with defense counsel Larry Hutcher regarding proposed settlement issues, and thereafter conferring with TP and JBM regarding strategy on settlement
5/22/2024	TP	0.2	Review of 6th RFPs
5/22/2024	TP	0.5	Conference with JBM and SLW regarding settlement strategy
5/23/2024	JBM	0.2	Office conference with EDR re document review
5/23/2024	JBM	0.2	Follow up correspondence and recording strategy notes regarding same
5/23/2024	JBM	0.5	Telephone conference with TP re settlement strategy
5/23/2024	JBM	0.5	Telephone call with TP and SLW re settlement strategy
5/23/2024	NAR	0.8	Review and analyze discovery and custodians
5/23/2024	NAR	1	Review discovery digest
5/23/2024	NAR	4	Review defendant productions, identified HOT docs
5/23/2024	SLW	0.4	Conferring further with TP and JBM regarding strategy for settlement, and communicating with defense counsel Larry Hutcher regarding further settlement meeting
5/23/2024	TP	0.5	Conference with JBM regarding settlement strategy
5/23/2024	TP	0.5	Conference with JBM and SLW regarding settlement strategy
5/24/2024	EDR	0.2	Call with JBM regarding email from defense counsel
5/24/2024	EDR	0.8	Review documents from exemplar invoice search
5/24/2024	JBM	0.5	Review and analysis of email correspondence from defense counsel re custodians
5/28/2024	EDR	0.6	Prepare document production
5/28/2024	EDR	3.1	Draft email regarding discovery disputes
5/28/2024	JBM	0.2	Attention to email correspondence with defense counsel re settlement issues
5/28/2024	NAR	4	Review defendant productions, identified documents supporting Pl's claims
5/29/2024	EDR	1.4	Review Defendants' document production regarding customer declarations
5/29/2024	JBM	0.2	Office conference with TP to prepare for settlement strategy session with TP and SLW
5/29/2024	JBM	0.2	Office conference with TP and SLW re settlement strategy
5/29/2024	JBM	0.2	Follow up office conference with TP
5/29/2024	JBM	0.2	Edit outline of counter demand and review documents in connection with same
5/29/2024	NAR	5	Review defendant productions, discovery digest notes
5/29/2024	SLW	0.6	Prepare and circulate to team proposed counter demand to defendants
5/29/2024	TP	0.2	Conference with JBM and SLW regarding settlement strategy
5/29/2024	TP	0.4	Multiple conferences with JBM regarding settlement strategy



Date	Atty	Time	Description
5/29/2024	TP	1.2	Review and revision of settlement counter and multiple conferences with SLW re same
5/30/2024	EDR	0.3	Call with JBM regarding discovery disputes
5/30/2024	EDR	0.7	Send email to defense counsel regarding deficiencies in customer declaration production
5/30/2024	EDR	0.8	Revise and send email to defense counsel regarding discovery disputes
5/30/2024	JBM	0.2	Telephone call with SLW re settlement demand and review of revised demand in connection with same
5/30/2024	JBM	0.2	Calls to C. Tucci re administration issues
5/30/2024	JBM	0.2	Prepare for settlement conference with D. Hutcher
5/30/2024	JBM	0.2	Attend and lead settlement conference with D. Hutcher
5/30/2024	JBM	0.2	Office conference with EDR regarding same
5/30/2024	JBM	0.5	Review and analysis of EDR email responding to defense counsel email re custodians and edit same
5/30/2024	NAR	0.1	Call with JBM re defendant productions
5/30/2024	NAR	0.1	Discuss settlement with DJB
5/30/2024	NAR	6	Review defendant productions, organized discovery digest, additional notes
5/30/2024	SLW	0.7	Prepare for and participate on Zoom settlement conference with Larry Hutcher
5/31/2024	JBM	0.5	Review and edit EDR deficiency email regarding Defendants' responses to Fifth RFPs
5/31/2024	JBM	0.5	Telephone calls with EDR and review defendants' responses to discovery requests in connection with same
5/31/2024	NAR	3.5	Review defendant productions
6/3/2024	JBM	0.2	Office conference with Nar re progress on review
6/3/2024	JBM	0.5	Attention to email from opposing counsel re deficiency issues and office conference with EDR in connection with same
6/3/2024	NAR	0.1	Circulate call invite
6/3/2024	NAR	5	Draft/revise discovery digest, review additional documents from defendant productions, identified useful documents
6/4/2024	EDR	0.6	Prepare for meet and confer
6/4/2024	EDR	0.7	Meet and confer regarding discovery deficiencies
6/4/2024	EDR	1.4	Research [REDACTED]
6/4/2024	JBM	0.2	Follow up office conference with EDR and NAR re meet and confer
6/4/2024	JBM	0.2	Email to TP summarizing results of meet and confer
6/4/2024	JBM	0.2	Office conference with EDR re production review
6/4/2024	JBM	0.5	Office conference with NAR re next steps re document review and discovery digest
6/4/2024	JBM	0.5	Office conference with EDR re meet and confer
6/4/2024	JBM	0.7	Attend and lead meet and confer
6/4/2024	JBM	1	Review email from E. Przybylko re Plaintiff's production and prepare for meet and confer
6/4/2024	NAR	0.2	Call with JBM and EDR re discovery



Date	Atty	Time	Description
6/4/2024	NAR	0.7	Meet and confer regarding discovery deficiencies
6/4/2024	NAR	5	Review defendants' productions, made notes of documents in support of claims, discovery digest
6/5/2024	EDR	3.4	Draft email regarding deficiencies in Defendants' document production and responding to questions about exemplar invoices
6/5/2024	JBM	0.2	Attention to scheduling emails regarding status conference
6/5/2024	JBM	0.5	Edit NAR proposed scheduling letter and attention to further emails regarding scheduling
6/5/2024	JBM	0.5	Office conference with NAR and EDR in connection with same
6/5/2024	NAR	0.2	Revise letter
6/5/2024	NAR	0.2	Emails with JBM and def counsel re letter
6/5/2024	NAR	0.3	File letter
6/5/2024	NAR	0.7	Draft letter re adjourning conference
6/5/2024	NAR	4.5	Review and revise discovery digest and review productions, emailed same to other attys on the case
6/5/2024	SLW	0.1	Upon receipt of J. Krause adjournment of motion after review of application to postpone discovery conference, review thereof
6/6/2024	EDR	0.1	Call with client regarding exemplar invoices
6/6/2024	EDR	0.2	Call with client regarding [REDACTED]
6/6/2024	EDR	0.6	Draft email regarding deficiencies in defendants' document production and responding to questions about exemplar invoices
6/6/2024	NAR	0.2	Call with EDR re defendant productions
6/6/2024	NAR	2.5	Review and revise discovery digest and review productions
6/7/2024	EDR	0.4	Calls with JBM regarding deficiency email
6/7/2024	EDR	1.8	Revise email regarding deficiencies in defendant's' document production and responding to questions about exemplar invoices
6/7/2024	JBM	0.2	Office conferences with NAR re document review and deposition strategy
6/7/2024	JBM	0.2	Office conference with TP re discovery strategy
6/7/2024	JBM	0.2	Follow up office conference with TP and DJB regarding same
6/7/2024	JBM	0.2	Office conference with NAR re relevant employee email
6/7/2024	JBM	0.5	Follow up office conference with NAR regarding same and to discuss potential depositions
6/7/2024	JBM	0.5	Review EDR follow up email re June 4 meet and confer and edit same
6/7/2024	JBM	0.5	Office conference with EDR in connection with same
6/7/2024	JBM	0.5	Attention to revised version of EDR email re June 4 meet and confer and review discovery documents in connection with same
6/7/2024	JBM	0.5	Revise and edit EDR email re June 4 meet and confer and transmit same to defendant
6/7/2024	JBM	0.7	Review NAR email re relevant employees to depose and potential additional custodians and review prior correspondence with defense counsel in connection with same
6/7/2024	NAR	0.5	Draft deposition notice and discuss same with JBM
6/7/2024	NAR	1.8	Draft discovery strategy list and discuss same with JBM
6/7/2024	NAR	2.8	Review defendant productions



Date	Atty	Time	Description
6/7/2024	TP	0.2	Conference with JBM regarding discovery tasks
6/7/2024	TP	0.2	Conference with JBM and EDR regarding deposition and discovery strategy and tasks
6/11/2024	JBM	0.2	Office conference with NAR re privilege log and document review issues
6/11/2024	JBM	0.2	Telephone call with D. Forrest re ESI issues
6/11/2024	JBM	0.7	Telephone call with D. Forrest re issues regarding Defendant's narrow view of relevance
6/12/2024	JBM	0.7	Review and analysis of email correspondence from E. Pryzbylko and email correspondence with EDR in connection with same
6/12/2024	NAR	0.5	Draft and serve deposition notice
6/12/2024	NAR	0.5	Discuss deposition strategy with JBM
6/13/2024	JBM	0.2	Office conference with TP regarding scheduling matters
6/13/2024	JBM	0.2	Attention to scheduling developments and office conference with DJB in connection with same
6/13/2024	JBM	0.2	Office conference with DJB regarding settlement issues
6/13/2024	JBM	0.2	Office conference with TP regarding settlement issues
6/13/2024	JBM	0.2	Correspondence with TP and SLW regarding settlement issues
6/13/2024	TP	0.2	Conference with JBM regarding settlement issues
6/14/2024	SLW	0.1	Draft and send email to Larry Hutcher re renewed settlement conference
6/17/2024	JBM	1.2	Review documents, prior correspondence with EDR, and case file in connection with same
6/17/2024	JBM	2	Edit search term proposal and respond to discovery email from defense counsel regarding additional custodians and deficiencies in Defendants' responses to Plaintiffs' 5th RFPs
6/18/2024	JBM	0.2	Email correspondence with defense counsel regarding scheduling meet and confer
6/19/2024	JBM	0.2	Attention to calendaring issues and email to opposing counsel re deposition scheduling
6/20/2024	JBM	0.2	Telephone calls with SLW regarding settlement
6/20/2024	JBM	0.2	Call with SLW and L. Hutcher
6/20/2024	JBM	0.2	Call with TP and SLW regarding MB settlement offer
6/20/2024	SLW	0.1	Review response from L. Hutcher re renewed mediation
6/20/2024	TP	0.2	Conference with L. Hutcher re Defendants' settlement offer
6/20/2024	TP	0.2	Follow up conference with SLW and JBM re same
6/24/2024	JBM	0.2	Attention to scheduling matters
6/24/2024	JBM	0.2	Office conference with NAR regarding same
6/24/2024	JBM	0.2	Edit NAR email re deposition dates and search terms
6/24/2024	JBM	0.2	Follow up email correspondence with NAR in connection with same
6/24/2024	JBM	0.5	Review MB 6/21/24 responses to discovery requests and email to NAR in connection with same
6/24/2024	NAR	1	Draft email to def counsel re discovery
6/25/2024	JBM	0.2	Attention to scheduling matters
6/25/2024	JBM	0.2	Settlement call with L. Hutcher



Date	Atty	Time	Description
6/25/2024	JBM	0.2	Follow up office conference with SLW regarding same
6/26/2024	JBM	0.2	Emails with opposing counsel re deposition scheduling
6/26/2024	JBM	1	Attend and lead meet and confer with opposing counsel
6/26/2024	JBM	2.2	Draft agenda for meet and confer with opposing counsel, including hit report issues, production of documents responsive to Plaintiffs' 5th RFPs and additional custodians
7/2/2024	JBM	0.7	Edit post-conferral email from NAR
7/9/2024	JBM	0.2	Office conference with NAR re deficiencies in Defendants' document productions
7/10/2024	JBM	0.2	Telephone call with SLW and TP re settlement strategy and case to dos
7/10/2024	JBM	0.5	Follow up review and analysis of same and email to defense counsel regarding same
7/10/2024	JBM	0.7	Review of filings in [REDACTED]
7/10/2024	JBM	1	Review and analysis of El Jamal, Wertheimer, Paolucci hit reports from defendants
7/10/2024	TP	0.2	Conference with JBM and SLW regarding settlement tasks
7/10/2024	TP	1.2	Review of [REDACTED]
7/11/2024	JBM	0.5	Attention to email correspondence from opposing counsel re settlement matters, call with TP and DJB, and email to SLW and opposing counsel in connection with same
7/12/2024	JBM	0.2	Office conference with DJB re settlement issues
7/12/2024	JBM	0.5	Prepare for settlement call
7/12/2024	JBM	0.5	Attend settlement call with L. Hutcher, TP and SLA and follow up calls with TP and L. Hutcher regarding same
7/12/2024	TP	0.7	Conferences with L. Hutcher and SLW, JBM re settlement
7/15/2024	JBM	0.2	Office conference with TP re settlement issues and call with SLW in connection with same
7/15/2024	JBM	0.2	Telephone call with SLW re settlement process
7/15/2024	JBM	0.2	Attention to scheduling emails
7/15/2024	JBM	0.5	Prepare for settlement call with opposing counsel
7/15/2024	JBM	0.5	Attend and lead settlement call with opposing counsel
7/16/2024	JBM	0.2	Office conference with TP in connection with same
7/16/2024	JBM	0.2	Draft email to opposing counsel re stay and revise and edit letter in connection with same
7/16/2024	JBM	0.7	Draft stay letter and review prior stay letters in connection with same
7/16/2024	JBM	0.7	Revise and edit MOU
7/16/2024	JBM	1.5	Review prior correspondence and analysis re MOU
7/16/2024	TP	0.2	Review and redline of stay request letter to court
7/16/2024	TP	0.2	Conference with JBM regarding litigation stay and settlement to dos
7/17/2024	JBM	0.2	Emails with mediator's office regarding mediation dates
7/17/2024	JBM	0.7	Telephone call with D. Hutchinson regarding data issues
7/17/2024	JLH	0.1	Attention to file and calendar re recent ECF order



Date	Atty	Time	Description
7/17/2024	SLW	0.4	Prepare for and confer with L. Hutcher and JBM regarding potential settlement
7/18/2024	JBM	0.2	Telephone call with TP re MOU issues
7/18/2024	JBM	0.2	Email correspondence with mediator's office regarding scheduling mediation dates
7/18/2024	JBM	0.5	Review documents in connection with same
7/18/2024	JBM	0.5	Follow up calls with D. Hutchinson regarding settlement data issues
7/18/2024	JBM	0.5	Telephone calls with SLW re MOU issues
7/18/2024	JBM	0.7	Telephone calls with D. Hutchinson regarding data issues
7/18/2024	TP	0.2	Conference with JBM regarding MOU and settlement
7/19/2024	JBM	0.2	Call with TP regarding same
7/19/2024	JBM	0.2	Update MOU and follow up call with TP in connection with same
7/19/2024	JBM	0.5	Telephone call with D. Hutchinson re data issues
7/19/2024	JBM	0.5	Follow up calls with D. Hutchinson
7/19/2024	JBM	0.5	Review and analysis of data provide by D. Hutchinson
7/19/2024	SLW	0.1	Communicating with JBM and TP regarding renewed mediation
7/19/2024	TP	0.2	Conference with JBM regarding damages calculation
7/22/2024	JBM	0.2	Review data analysis of redemptions from D. Hutchinson
7/22/2024	JBM	0.2	Call with D. Hutchinson to discuss data analysis
7/22/2024	JBM	0.2	Revise and edit MOU in connection with same and draft email to opposing counsel regarding same
7/22/2024	JBM	0.2	Attention to email correspondence from SLW re settlement issues
7/23/2024	SLW	0.3	Call with Larry H who reached out re settlement negotiations, and updating team re call
7/27/2024	SLW	0.4	Editing MOU and circulating to JBM and TP for comment
7/29/2024	JBM	0.2	Draft email to opposing counsel re same
7/29/2024	JBM	0.2	Office conference with DJB re same
7/29/2024	JBM	0.5	Attention to prior settlement correspondence and email to defense counsel regarding same
7/29/2024	JBM	0.7	Review prior class action settlement agreements in connection with same
7/29/2024	JBM	1	Revise and edit MOU
7/30/2024	JBM	0.2	Telephone call with SLW re MOU edits
7/30/2024	JBM	0.2	Office conference with TP in connection with same
7/30/2024	JBM	0.2	Follow up conference with TP in connection with same
7/30/2024	JBM	0.5	Prepare for and outline topics for meeting with opposing counsel re MOU
7/30/2024	JBM	0.7	Attend and lead meeting with opposing counsel re MOU terms
7/30/2024	SLW	0.6	Prepare for and confer with defense counsel regarding revised MOU terms together w- JBM and TP
7/30/2024	TP	0.4	Conferences with JBM pre and post meet and confer regarding MOU and settlement issues
7/30/2024	TP	0.7	Meet and confer with defense counsel regarding MOU and settlement
8/5/2024	JBM	0.2	Attention to calendaring matters



Date	Atty	Time	Description
8/5/2024	JBM	0.2	Office conference with EDR re recent case events and debrief
8/5/2024	JBM	0.7	Draft email and prepare redline comparison of documents to send to defense counsel
8/5/2024	JBM	1.2	Attention to defense counsel edits to MOU and review and analysis of same
8/5/2024	SLW	0.7	Upon receipt of defense counsel markup of MOU, review thereof
8/6/2024	JBM	0.2	Telephone call with SLW re defense edits to proposed MOU
8/6/2024	JBM	0.2	Email correspondence and scheduling with defense counsel regarding settlement
8/6/2024	SLW	0.1	Telephone conference with additional Mediator Barry Peak of Scheinman Mediation regarding strategy for upcoming continued mediation on August 15
8/6/2024	SLW	0.7	Editing and sending to Defendants' latest version of MOU together with cover email explaining revised terms and suggested procedural issues
8/7/2024	JBM	0.2	Call with SLW and email to defense counsel re scheduling issues
8/7/2024	JBM	0.5	Prepare for settlement meeting
8/7/2024	JBM	0.5	Attend settlement meeting
8/7/2024	JBM	0.5	Revise MOU and email correspondence with defense counsel in connection with same
8/7/2024	SLW	0.6	Participating on video settlement conference with defense counsel
8/8/2024	JBM	0.2	Attention to correspondence from mediator's office and SLW regarding 8/15 mediation
8/8/2024	JBM	0.2	Further correspondence with defense counsel regarding scheduling
8/8/2024	JBM	0.2	Review of draft MOU and telephone call with SLW in connection with same
8/9/2024	JBM	0.2	Correspondence with B. Peek regarding attending mediation
8/9/2024	JBM	0.2	Attention to email from SLW and email to defense counsel transmitting revised MOU
8/9/2024	JBM	0.5	Revise and edit MOU and draft email to SLW in connection with same
8/9/2024	SLW	0.7	Review latest defense edits to MOU circulated by defense counsel Peter Ripin, and editing email to defendants regarding MOU circulated by Peter Ripin on Thursday, August 8 re non-disparagement provision, as well as alternate Mediator
8/10/2024	SLW	0.1	Communicating with team re agreed changes to MOU
8/12/2024	JBM	0.2	Attention to correspondence from opposing counsel re settlement and email to SLW in connection with same
8/12/2024	JBM	0.2	Save documents to case file
8/12/2024	SLW	0.2	Review comments from Peter R re defense changes to MOU
8/13/2024	JBM	0.2	Save documents to case file
8/13/2024	JBM	0.2	Attention to settlement-related correspondence from SLW
8/13/2024	SLW	0.1	Confer with named Plaintiffs re [REDACTED]
8/13/2024	SLW	0.6	Draft and send email to defense counsel re MOU non-disparagement clause
8/14/2024	JBM	0.2	Telephone call with SLW re pre-mediation email to M. Scheinman



Date	Atty	Time	Description
8/14/2024	JBM	0.2	Review prior correspondence regarding settlement and outline email to M. Scheinman regarding same
8/14/2024	JBM	0.2	Follow up correspondence with SLW and M. Scheinman regarding same
8/14/2024	JBM	0.5	Draft email to M. Scheinman and further document review in connection with same
8/14/2024	SLW	0.7	Providing final comments to executive mediation summary for Mediators Scheinman and Peek in advance of continued mediation
8/15/2024	JBM	0.2	Telephone calls with SLW, M. Scheinman, and B. Peek in connection with same
8/15/2024	JBM	0.2	Telephone call with SLW in connection with same
8/15/2024	JBM	0.2	Telephone call with defense counsel in connection with same and call to L. Hutcher and P. Ripin in connection with same
8/15/2024	JBM	0.2	Attention to email correspondence from defense counsel in connection with same
8/15/2024	JBM	0.5	Attend mediation
8/15/2024	JBM	0.5	Telephone call with SLW in connection with same
8/15/2024	JBM	0.7	Prepare for mediation
8/15/2024	JBM	0.7	Revise and edit MOU following mediation
8/15/2024	JBM	0.7	Revise and edit MOU and finalize same
8/15/2024	JBM	0.7	Email to defense counsel and prepare documents in connection with same
8/15/2024	SLW	0.9	Final preparation and participating at continued mediation with Mediators Scheinman and Peek, and defense counsel
8/16/2024	EDR	0.2	Conference with SLW regarding settlement
8/16/2024	EDR	0.3	Conference with JBM and SLW regarding settlement
8/16/2024	EDR	0.3	Finalize and file letter requesting extension of stay
8/16/2024	JBM	0.2	Attention to email correspondence from defense counsel re stay extension and edit draft stay extension request and assemble documents in connection with same
8/16/2024	JBM	0.2	Attention to executed MOU from defense counsel and save documents to case file
8/16/2024	JBM	0.2	Office conference with EDR in connection with same
8/16/2024	JBM	0.2	Office conference with JLH, TP, and EDR concerning executed MOU
8/16/2024	JBM	0.5	Telephone call with SLW re expenses and draft email to opposing counsel re expenses
8/16/2024	JBM	0.5	Revise and edit letter to J. Krouse re extension request
8/16/2024	JBM	0.5	Telephone call with SLW and EDR concerning executed MOU
8/16/2024	JBM	0.5	Organize case file
8/16/2024	JBM	0.5	Office conference with EDR re claims admin RFP and long form settlement agreement
8/16/2024	JBM	0.7	Attention to email correspondence from defense counsel re expenses and review expense files in connection with same
8/16/2024	SLW	0.2	Conferring with Connie P re [REDACTED]
8/16/2024	TP	0.2	Conference with JBM and EDR re MOU execution
8/17/2024	SLW	0.1	Updating team re call with Cap 111 principal



Date	Atty	Time	Description
8/19/2024	EDR	2.3	Draft request for settlement administrator proposal and send to defense counsel
8/19/2024	JBM	0.2	Office conference with EDR re RFP administration letter
8/19/2024	JBM	0.2	Office conference with EDR in connection with same
8/19/2024	JBM	0.5	Edit proposed email to defense counsel and attention to email correspondence from SLW in connection with service awards
8/19/2024	JBM	1	Review and edit RFP administration letter and review case file documents in connection with same
8/20/2024	EDR	0.9	Draft settlement agreement
8/20/2024	EDR	1.1	Revise and send administrator RFPs
8/20/2024	JBM	0.5	Office conference with EDR re settlement administrator RFPs
8/21/2024	EDR	0.3	Call with JBM regarding data for settlement
8/21/2024	EDR	0.3	Correspondence with settlement administrator
8/21/2024	EDR	4.5	Draft settlement agreement
8/21/2024	JBM	0.2	Attention to email from defense counsel re class data
8/21/2024	JBM	0.2	Office conference with EDR re class data
8/21/2024	JBM	0.5	Attention to email from settlement administrator re RFP and office conference with EDR in connection with same
8/21/2024	SLW	0.2	Conferring with Joe Buetti Village Social principal [REDACTED]
8/21/2024	SLW	0.3	Review communications regarding selection of claims administrator
8/22/2024	EDR	2.8	Draft settlement agreement
8/22/2024	SLW	0.1	Emailing team with update re Village Social
8/23/2024	EDR	0.3	Correspondence with defense counsel regarding data production
8/23/2024	EDR	2.3	Draft settlement agreement
8/26/2024	EDR	0.4	Correspondence with defense counsel regarding data production
8/26/2024	EDR	3.1	Draft settlement agreement
8/27/2024	EDR	0.2	Coordinate data production
8/27/2024	SLW	0.2	Review Arden Claims Administrator proposal
8/28/2024	EDR	0.2	Coordinate data production
8/28/2024	SLW	0.1	Communicating with Controller Natalie Swatz [REDACTED]
8/29/2024	EDR	0.3	Call with SLW regarding settlement administrators
8/29/2024	EDR	0.5	Correspondence regarding settlement administrators
8/29/2024	SLW	0.1	Received phone call from Peter R re various settlement issues and reporting to team
8/30/2024	EDR	0.3	Call with data scientist regarding analysis for settlement
9/3/2024	EDR	0.2	Email settlement administrator regarding bid
9/3/2024	EDR	0.4	Call with settlement administrator regarding bid
9/4/2024	EDR	0.2	Correspondence with settlement administrator regarding bid
9/4/2024	EDR	0.3	Call with settlement administrator regarding bid
9/4/2024	JBM	0.2	Email and office conference with EDR re data uploads
9/5/2024	EDR	0.1	Correspondence with data scientist regarding volume of data production
9/5/2024	JBM	0.2	Office conference with TP to discuss edits to MB settlement agreement



Date	Atty	Time	Description
9/5/2024	JBM	0.2	Office conferences with EDR in connection with same
9/5/2024	JBM	2.7	Revise and edit MB settlement agreement
9/5/2024	TP	0.3	Conference with JBM re settlement agreement edits
9/5/2024	TP	4.3	Reviewing and revising draft settlement agreement
9/6/2024	JBM	0.2	Email to TP regarding same
9/6/2024	JBM	0.7	Office conference with EDR regarding data items and follow up conference regarding next steps
9/6/2024	JBM	0.7	Revise and edit settlement agreement in connection with same
9/6/2024	JBM	1.2	Review of docket entries and prior emails with opposing counsel in connection with same
9/6/2024	JBM	1.5	File research on settlement administration issues and calculation of non-monetary valuation
9/6/2024	JBM	2.5	Further editing of settlement agreement and testing of QSF issues in connection with same
9/6/2024	JBM	2.7	Continued editing of TP draft of settlement agreement
9/7/2024	SLW	0.9	Review and edit of Plaintiffs' draft settlement agreement
9/9/2024	EDR	0.2	Email defense counsel regarding settlement agreement
9/9/2024	EDR	0.3	Call with JBM regarding settlement agreement
9/9/2024	EDR	3.3	Draft settlement agreement
9/9/2024	JBM	0.2	Office conference with EDR re settlement agreement and administration next steps
9/9/2024	JBM	0.5	Further office conferences with EDR re settlement agreement issues
9/9/2024	JBM	1	Attention to and revise and edit EDR draft of settlement agreement and office conference with EDR in connection with same
9/9/2024	SLW	1	Finalizing edits to draft settlement agreement and circulating comments and edits to team
9/16/2024	EDR	2.1	Draft exhibits to settlement agreement
9/16/2024	SLW	0.1	Conferring with EDR regarding strategy in light of defendants' delay in communication re proposed settlement agreement and claims administrator selection
9/19/2024	SLW	0.2	Emailing Larry H and team regarding proposed settlement agreement
9/20/2024	SLW	0.7	Review email from Peter R re defendants' agreement on Arden claims administrator selection and enclosing defense comments on settlement agreement
9/23/2024	JBM	0.5	Attention to calendaring issues and email from SLW re settlement agreement
9/24/2024	JBM	0.2	Attention to correspondence from claims administrator and call to C. Tucci
9/24/2024	JBM	0.2	Email to SLW re deposition costs
9/24/2024	SLW	1.6	Review and edit of Defendants' mark-up to settlement agreement, and circulating proposed changes to team
9/25/2024	EDR	1.8	Draft exhibits to settlement agreement
9/25/2024	JBM	1.5	Review and analysis of pertinent case law and assess potential risk to class members



Date	Atty	Time	Description
9/25/2024	JBM	2.5	Attention to ACS data breach and perform legal research in connection with same
9/26/2024	EDR	0.2	Call with JBM regarding settlement administrator
9/26/2024	JBM	0.2	Call with C. Tucci of R2 Claims
9/26/2024	JBM	0.2	Telephone call with SLW regarding same
9/26/2024	JBM	0.2	Review and edit settlement agreement
9/26/2024	JBM	0.5	Call with B. Johns re data issues
9/26/2024	JBM	1.2	Review and analysis of Arden claims issues
9/26/2024	SLW	0.1	Upon receipt from defense counsel Ripin re settlement agreement, review thereof
9/27/2024	EDR	0.4	Review and analyze class action filed against Arden
9/27/2024	EDR	0.6	Revise exhibits to settlement agreement
9/27/2024	JBM	0.2	Office conference with EDR in connection with same
9/27/2024	JBM	0.2	Office conference with EDR in connection with same
9/27/2024	JBM	0.5	Review sample orders from J. Sibel in connection with same
9/27/2024	JBM	0.5	Telephone calls to JFP regarding Papa Johns case
9/27/2024	JBM	0.5	Office conferences with EDR in connection with same
9/27/2024	JBM	0.5	Calls to defense counsel and draft email re settlement agreement
9/27/2024	JBM	0.5	Telephone call with ACS re data security issues
9/27/2024	JBM	0.7	Further edits of notice documents
9/27/2024	JBM	1	Edit preliminary and final approval orders
9/27/2024	JBM	1.5	Edit notice documents
9/27/2024	JBM	1.7	Further editing of settlement agreement
9/27/2024	JBM	2.2	Further review and editing of settlement agreement
9/27/2024	JBM	2.5	Further edits to settlement agreement
9/27/2024	SLW	1.5	Review proposed class notice, short notice, claims form and attendant administration documents
9/30/2024	EDR	0.1	Email memorializing call regarding Arden data breach
9/30/2024	EDR	0.3	Call with defense counsel regarding Arden data breach
9/30/2024	JBM	0.2	Attend and lead call with L. Hutcher and follow up office conference with EDR in connection with same
9/30/2024	JBM	0.2	Email correspondence with ACS re selection of settlement administrator
9/30/2024	JBM	0.2	Email correspondence with C. Tucci re settlement administrator
9/30/2024	JBM	0.5	Prepare for telephone call with SLW and L. Hutcher re Arden issues
9/30/2024	SLW	0.3	Conferring with defense Counsel Larry Hutcher regarding Arden and administration issues, and conferring with team
10/1/2024	JBM	0.2	Telephone call with SLW re settlement issues
10/7/2024	JBM	0.5	Save documents to case file and organize correspondence
10/10/2024	SLW	0.1	Review defense letter regarding expiration of stay and confer with team regarding response
10/11/2024	EDR	0.4	Draft and file request to extend stay
10/11/2024	JBM	0.2	Attention to correspondence from defense counsel re settlement agreement and office conference with EDR in connection with same
10/11/2024	JBM	0.2	Telephone call with SLW in connection with same



Date	Atty	Time	Description
10/11/2024	JBM	0.5	Revise and edit EDR draft of extension letter
10/15/2024	JBM	0.5	Save documents to case file
10/17/2024	DJK	0.2	Call with Ethan re proofing assignment
10/17/2024	DJK	1	Proofing
10/17/2024	EDR	0.2	Call with DJK regarding exhibits to settlement agreement
10/17/2024	JBM	0.2	Office conference with EDR re notice documents
10/17/2024	JBM	0.2	Save documents to case file
10/17/2024	SLW	1.3	Review of defendants' proposed edits to plaintiffs' draft settlement agreement, preliminary approval order, final approval order, and short form and long form notices
10/18/2024	EDR	0.7	Revise email notice and long-form notice exhibits to settlement agreement
10/21/2024	DJK	0.7	Preliminary and Final Order Proofread
10/21/2024	JBM	0.2	Save documents to case file
10/22/2024	EDR	0.4	Revise proposed orders for settlement agreement
10/22/2024	EDR	3.7	Draft preliminary settlement motion
10/22/2024	JBM	0.2	Office conferences with EDR in connection with same
10/22/2024	JBM	0.2	Revise and edit preliminary approval order
10/22/2024	JBM	0.2	Email to team regarding SLW review of settlement documents
10/22/2024	JBM	0.5	Revise and edit short form notice
10/22/2024	JBM	0.5	Revise and edit long form notice
10/22/2024	JBM	0.5	Revise and edit final approval order
10/22/2024	JBM	0.5	Telephone conference with SLW regarding edits to settlement agreement
10/22/2024	JBM	0.5	Draft email to SLW regarding same and review documents in connection with same
10/22/2024	JBM	0.7	Draft comprehensive email correspondence to defense counsel regarding outstanding settlement issues
10/22/2024	JBM	1	Further emails with SLW and revising of settlement agreement documents
10/22/2024	JBM	1.2	Revise and edit settlement agreement
10/22/2024	JBM	1.2	Revise and edit settlement agreement in connection with same
10/22/2024	SLW	0.1	, and conferring with JBM re proposed changes
10/22/2024	SLW	0.7	Review defendants' changes to settlement agreement
10/23/2024	EDR	1.4	Research for preliminary settlement motion
10/23/2024	EDR	3.1	Draft preliminary settlement motion
10/23/2024	JBM	0.2	Email correspondence regarding meet and confer re settlement issues
10/23/2024	JBM	0.2	Attention to further email correspondence regarding same
10/23/2024	JBM	0.5	Office conference with TP regarding settlement matters
10/23/2024	TP	0.5	Conference with JBM regarding settlement agreement edits
10/24/2024	EDR	0.3	Email data scientist regarding settlement allocation plan
10/24/2024	EDR	0.5	Draft preliminary settlement motion
10/24/2024	JBM	0.2	Attention to scheduling matters and office conference with EDR regarding same



Date	Atty	Time	Description
10/25/2024	EDR	0.1	Correspondence with team regarding settlement agreement
10/27/2024	JBM	0.2	Attention to text messages and email from SLW re Swanson settlement agreement and correspond regarding same
10/28/2024	DJK	0.4	Client letter and JBM Declaration
10/28/2024	EDR	0.5	Internal call regarding settlement agreement
10/28/2024	EDR	0.9	Meet and confer regarding settlement agreement
10/28/2024	EDR	0.9	Revise settlement agreement and exhibits
10/28/2024	JBM	0.2	Review and analysis of SLW email re Swanson settlement agreement
10/28/2024	JBM	0.2	Office conference with EDR in connection with same
10/28/2024	JBM	0.2	Follow up calls with EDR in connection with same
10/28/2024	JBM	0.2	Office conferences with EDR in connection with same
10/28/2024	JBM	0.5	Further revising and editing cover email to defense counsel regarding edits to settlement agreement
10/28/2024	JBM	0.7	Office conference with EDR, TP, and SLW regarding settlement agreement outstanding issues
10/28/2024	JBM	0.7	Further preparation for call to discuss settlement matters
10/28/2024	JBM	1	Attend and lead settlement discussions
10/28/2024	JBM	1.2	Revise and edit settlement agreement and draft comprehensive email to defense counsel describing further settlement agreement changes
10/28/2024	SLW	0.9	Preparing for and participating on video conference with all defense counsel, Larry Hutcher, Andy Granbois/MBeer General Counsel, and Peter Ripken regarding disputed issues on settlement agreement
10/28/2024	TP	0.7	Conference with EDR, SLW, and JBM regarding settlement agreement edits
10/28/2024	TP	0.9	Conference with defense counsel, JBM and SLW regarding settlement
10/29/2024	DJK	0.3	Call with EDR re Preliminary Approval Motion
10/29/2024	EDR	0.2	Correspondence with defense counsel regarding settlement agreement
10/29/2024	EDR	0.3	Call with DJK regarding preliminary approval motion
10/29/2024	EDR	0.3	Revise settlement agreement
10/29/2024	EDR	3.2	Research for preliminary settlement motion
10/29/2024	EDR	2.2	Draft preliminary settlement motion
10/29/2024	JBM	0.2	Save documents to case file
10/29/2024	JBM	0.5	Attention to defense edits to settlement agreement and office conference with EDR concerning same
10/29/2024	JBM	0.5	Call to R. McCloning regarding establishment of QSF and related administration fees
10/29/2024	JBM	0.5	Telephone call with ACS re administration issues
10/29/2024	JBM	0.5	Perform legal and internet research in connection with same
10/29/2024	SLW	0.1	Receipt from defense counsel Peter Ripin of confirmation that Defendants agree with revised settlement agreement
10/30/2024	DJK	5	Review and Revision of Motion for Preliminary Approval of Settlement: cite check cases to ensure accuracy, update case cites with newer case law, fix any typos or grammatical errors, collect



Date	Atty	Time	Description
			additional cases where necessary, interface with EDR regarding outstanding issues
10/30/2024	EDR	3.1	Draft preliminary settlement motion
10/30/2024	JBM	0.2	Office conference with EDR regarding submission of updates
10/30/2024	JBM	0.7	Attention to qsf related administration
10/30/2024	JBM	1.2	Final review of settlement agreement redlines to ensure correctness of all changes
10/30/2024	SLW	0.1	, and conferring with EDR regarding strategy
10/30/2024	SLW	0.4	Upon receipt from defense counsel of compromise agreement on settlement terms, review thereof
10/31/2024	DJK	2.7	Review and Revision of Motion for Preliminary Approval of Settlement
10/31/2024	EDR	3.2	Draft JBM declaration for preliminary settlement motion
10/31/2024	EDR	3.7	Revise preliminary settlement motion
10/31/2024	JBM	0.2	Attention to settlement administration matters
11/1/2024	DJK	5	Review and Revision of Motion for Preliminary Approval of Settlement: cite check cases to ensure accuracy, update case cites with newer case law, fix any typos or grammatical errors, collect additional cases where necessary; interface with EDR regarding outstanding issue
11/1/2024	EDR	5.3	Review DJK revisions to preliminary approval motion
11/1/2024	EDR	2.7	Revise preliminary approval motion
11/2/2024	DJK	2.8	Finish Mtn for Preliminary Approval
11/4/2024	DJK	2.2	Preliminary settlement motion
11/4/2024	EDR	1.2	Revise background section of preliminary approval motion
11/4/2024	EDR	1.2	Revise summary of settlement section of preliminary approval motion
11/4/2024	EDR	3.2	Revise procedural fairness section of preliminary approval motion
11/6/2024	DJK	0.2	Call with JLH re associate records
11/6/2024	DJK	1.5	Expenses calculation
11/6/2024	DJK	3.3	Associate hours compilation
11/6/2024	EDR	4.5	Revise substantive fairness section of preliminary approval motion
11/6/2024	EDR	2.5	Revise class certification section of preliminary approval motion
11/6/2024	EDR	0.2	Call with JBM, TP, JLH re preliminary approval and settlement strategy
11/6/2024	JBM	0.2	Office conference with EDR, TP, and JLH re preliminary approval and settlement strategy
11/6/2024	JLH	0.2	Correspondence w DJK re associate lodestar and expense gathering
11/6/2024	JLH	0.3	Call w DJK re associate lodestar
11/6/2024	SLW	0.2	Conferring with Class Representative Joe Buetti [REDACTED]
11/6/2024	TP	0.2	Conference with EDR, JLH and JBM regarding settlement and preliminary approval
11/7/2024	DJK	2	Associate hours compilation
11/7/2024	EDR	0.3	Coordinate signing of settlement agreement
11/7/2024	EDR	0.4	Review and analyze attorney recording



Date	Atty	Time	Description
11/7/2024	JLH	0.2	Correspondence w DJK re RMB hours
11/7/2024	JLH	0.3	Reviewing DJK's lodestar document; related emails to JBM with lodestar and expense totals; rates
11/7/2024	SLW	0.1	Communicating with defense counsel regarding timing of executed agreement
11/7/2024	SLW	0.2	Conferring further with Class Representative Joe Buetti [REDACTED]
11/8/2024	EDR	0.7	Coordinate signing of settlement agreement
11/8/2024	SLW	0.1	Review communication from Peter R regarding execution of settlement agreement
11/9/2024	SLW	0.3	Conferring with Class Representative Connie Petrovich/Cap 111 [REDACTED]
11/11/2024	JBM	0.2	Attention to email from SLW re Cap 111 signatures and review email in connection with same
11/11/2024	SLW	0.2	Additional communication with Class Representative Connie Petrovich [REDACTED]
11/12/2024	EDR	0.3	Call with JBM regarding preliminary approval motion
11/12/2024	EDR	1.2	Revise JBM declaration in support of preliminary approval motion
11/12/2024	EDR	2.1	Revise procedural fairness section of preliminary approval motion
11/12/2024	EDR	2.2	Revise substantive fairness section of preliminary approval motion
11/12/2024	EDR	2.1	Generally revise preliminary approval motion
11/13/2024	JBM	0.5	Office conference with EDR re preliminary approval papers and follow up office conference with TP and EDR re edits to preliminary approval papers
11/13/2024	TP	0.2	Conference with JBM and EDR re preliminary approval motion
11/13/2024	TP	4.2	Reviewing and revising draft of preliminary approval motion
11/14/2024	JBM	0.2	Office conference with TP re settlement to dos
11/14/2024	JBM	0.2	Office conference with TP and DJK re wage and hour settlement
11/14/2024	JBM	0.2	Attention to emails regarding settlement admin
11/14/2024	JBM	0.2	Save documents to and organize case file
11/14/2024	JBM	0.2	Attention to emails re ESI
11/14/2024	TP	0.2	Conference with JBM regarding settlement admin tasks
11/14/2024	TP	2.8	Reviewing and revising draft of preliminary approval motion and conducting caselaw research regarding recent preliminary approval motions in connection with same
11/15/2024	EDR	0.1	Call with T. Palikovic regarding total available damages for preliminary approval motion
11/15/2024	JBM	0.2	Attention to email correspondence re Swanson settlement agreement
11/15/2024	TP	2.6	Finalizing edits to preliminary approval motion
11/15/2024	TP	2.6	Reviewing and revising JBM declaration and notice of motion accompanying preliminary approval motion
11/18/2024	JBM	0.2	Office conference with AB re compiling hours
11/18/2024	JBM	0.2	Attention to email correspondence from EDR in connection with co-counsel time submissions and attention to same
11/18/2024	JBM	0.2	Follow up office conferences with AB in connection with same



Date	Atty	Time	Description
11/18/2024	JBM	0.2	Further office conferences with AB in connection with same
11/18/2024	JBM	0.2	Attention to emails regarding ESI hosting and expense tabulations and respond to same
11/18/2024	JBM	0.3	Review prior case filings and associate records in connection with same
11/19/2024	AB	1.5	Preparing expenses for submission to the Court; discussed same with JLH, JBM, and EDR.
11/19/2024	EDR	0.4	Revise JBM declaration in support of preliminary approval
11/19/2024	JBM	0.2	Save documents to case file and organize to do list
11/19/2024	JBM	0.2	Office conference with AB and TP re preliminary approval milestones
11/19/2024	JBM	0.2	Telephone conference with SLW and TP re preliminary approval papers and defense counsel review
11/19/2024	JBM	0.3	Draft comprehensive to do email to AB and TP re next steps
11/19/2024	JBM	0.4	Attention to scheduling order and review status of preliminary approval preparations
11/20/2024	AB	0.7	Collected expenses to be ultimately filed with the Court; communicated with EDR and JLH re same.
11/20/2024	EDR	0.3	Draft letter requesting page extension for preliminary approval motion
11/20/2024	EDR	1.4	Revise JBM declaration in support of preliminary approval
11/20/2024	EDR	3.8	Revise brief in support of preliminary approval
11/20/2024	JBM	0.2	Correspondence with AB re settlement prep issues
11/20/2024	JBM	0.2	Telephone call with SLW re preliminary approval issues
11/20/2024	JBM	0.2	Attention to class member contacts and telephone call to representative to class member
11/20/2024	JBM	0.2	Internet research in connection with same
11/20/2024	JBM	0.2	Respond to inquiry from settlement admin
11/21/2024	JBM	0.6	Review settlement agreement and docket filings in connection with same
11/21/2024	JBM	1	Review settlement agreement and case file in connection with same
11/21/2024	JBM	1.2	Revise and edit preliminary approval introduction
11/21/2024	JBM	1.4	Review and edit factual and procedural background section of preliminary approval brief
11/21/2024	JBM	2.4	Revise and edit settlement terms section of preliminary approval brief and review settlement agreement in connection with same
11/21/2024	SLW	0.1	Communicating with defense counsel Hutcher regarding outstanding issues
11/25/2024	JBM	0.2	Attention to email correspondence from EDR re settlement agreement and administration issues
11/25/2024	JBM	0.2	Review settlement agreement in connection with same
11/25/2024	JBM	0.2	Telephone calls with AB regarding preliminary approval memo
11/25/2024	JBM	0.6	Review and editing of JBM declaration in connection with same
11/25/2024	JBM	1.4	Review and edit JBM declaration and set up tables
11/25/2024	JBM	1.5	Further editing of preliminary approval brief and JBM declaration
11/25/2024	JBM	1.6	Continued editing of preliminary approval brief



Date	Atty	Time	Description
11/25/2024	JBM	2.6	Continued editing preliminary approval brief
11/25/2024	SLW	0.1	Follow-up communication with defense counsel Peter Ripkin and Larry Hutcher regarding settlement
11/26/2024	JBM	0.2	Attention to email correspondence from defense counsel and SLW regarding settlement matters and response re same
11/26/2024	JBM	0.3	Edit notice of motion for preliminary approval
11/26/2024	JBM	0.4	Further editing of JBM declaration
11/26/2024	JBM	1	Edit notice section preliminary approval brief and cross check JBM declaration in connection with same
11/26/2024	JBM	1.4	Edit EDR briefing on settlement fairness and class certification sections of brief
11/26/2024	JBM	2.4	Proof and line edit entire brief
11/26/2024	SLW	0.1	Communicating with defense counsel re meeting re outstanding settlement issue following Monday
11/27/2024	AB	1.1	Updated the expense and lodestar spreadsheets; discussed same with JBM and JLH.
11/27/2024	JBM	0.2	Correspondence with EDR in connection with same
11/27/2024	JBM	0.3	Edit intro to brief in connection with same
11/27/2024	JBM	0.3	Draft correspondence to EDR re data cited in declaration and attention to response regarding same
11/27/2024	JBM	0.6	Cross check calculations referenced in brief and JBM declaration and revise and edit same
11/27/2024	JBM	0.6	Office conference with AB and JLH re preliminary approval submission and further edits to JBM declaration in connection with same
12/2/2024	JBM	0.2	Organize case correspondence
12/2/2024	JBM	0.2	Attention to correspondence from SLW re preliminary approval and respond to same
12/2/2024	JBM	0.2	Attention to calendaring matters
12/2/2024	JBM	0.2	Attention to email correspondence re SLW expenses
12/2/2024	JBM	0.3	Follow up call with SLW in connection with same
12/2/2024	JBM	0.4	Follow up review of email correspondence in connection with same
12/2/2024	JBM	0.4	Review preliminary approval memo and JBM declaration re aggregate data cited and email to D. Hutchinson regarding same
12/2/2024	JBM	0.4	Draft letter to court re pre-motion conference requirement and page extension
12/2/2024	JBM	0.5	Call with SLW and TP re settlement strategy and prepare for call with opposing counsel
12/2/2024	JBM	0.6	Attention to email correspondence from opposing counsel re pre-motion conference requirement for preliminary approval brief and calls with SLW in connection with same
12/2/2024	SLW	0.3	Edit draft of letter to J. Seibel requesting waiver of pre-motion requirement for preliminary approval motion
12/2/2024	SLW	0.7	Conferring on meet and confer with defense counsel L Hutcher and Peter R re settlement issues, and with JBM re pre-motion



Date	Atty	Time	Description
			requirement for preliminary approval motion, as well as defense counsel on court rules
12/3/2024	AB	0.8	Categorized expenses and edited the corresponding table in the declaration ISO preliminary approval motion.
12/3/2024	JBM	0.2	Telephone call with SLW in connection with same
12/3/2024	JBM	0.4	Attention to email from defense counsel re extension letter and telephone call with SLW in connection with same
12/3/2024	JBM	0.4	Telephone call and emails with D. Hutchinson re class data issues
12/3/2024	JBM	0.4	Draft email response to P. Ripin email
12/3/2024	JBM	0.4	Attention to SLW email re edits to P. Ripin email and revise and edit same
12/3/2024	JBM	0.4	Further editing of same
12/3/2024	JBM	0.4	Save documents to case file
12/3/2024	JBM	0.4	Review firm resume and correspondence with AB in connection with same
12/3/2024	JBM	0.4	Edit firm resume
12/3/2024	JBM	1	Review and edit preliminary approval brief
12/3/2024	JBM	1	Edit preliminary approval brief and JBM declaration with updates from D. Hutchinson
12/3/2024	JBM	1.6	Further review and editing of preliminary approval brief and JBM declaration
12/3/2024	SLW	0.1	Review communication with Peter R re agreement on proposed preliminary approval motion submission
12/3/2024	SLW	1.2	Review and edit penultimate version of brief in support of preliminary class approval
12/4/2024	JBM	0.4	Proof brief and email to defense counsel for review
12/4/2024	JBM	0.4	Correspondence with AB re firm resume and office conference in connection with same
12/4/2024	JBM	1.2	Attention to SLW edits to preliminary approval brief and revise and edit same
12/4/2024	SLW	1.2	Review penultimate version of Plaintiff counsel's Declaration and exhibits in support of motion for preliminary class approval
12/5/2024	AB	2.2	Reviewed MOL and Declaration ISO preliminary approval, made edits; checked and corrected citations.
12/5/2024	JBM	0.1	Email to opposing counsel re non opposition to declaration
12/5/2024	JBM	0.2	Telephone call with SLW re settlement strategy
12/5/2024	JBM	0.2	Office conference with AB re editing preliminary approval brief and later declaration
12/5/2024	JBM	0.2	Save documents to case file
12/5/2024	JBM	0.3	Revise and edit letter motion to forego pre-motion requirement and for excess pages
12/5/2024	JBM	0.4	Finalize and file same
12/5/2024	JBM	0.4	Attention to contact from potential class member
12/5/2024	JBM	1	Attention to P. Ripin edits to preliminary approval brief and revise and edit JBM declaration in connection with same



Date	Atty	Time	Description
12/5/2024	SLW	0.3	Review Defense counsel Ripkin's comments and edits to Plaintiff's preliminary approval memo of law
12/6/2024	AB	4.1	Reviewed MOL and Declaration ISO preliminary approval, made edits; checked and corrected citations.
12/6/2024	JBM	0.2	Revise and edit notice of motion
12/6/2024	JBM	0.3	Office conference with AB re edits to preliminary approval memo and declaration and filing logistics re same
12/6/2024	JBM	0.3	Attention to court ruling re preliminary approval motion and office conference with AB in connection with same
12/6/2024	JBM	0.4	Revise and edit long form notice and firm resume in connection with same
12/6/2024	JBM	0.5	Revise and edit JBM declaration
12/6/2024	JBM	0.9	Prepare exhibits to preliminary approval motion
12/6/2024	JBM	1.7	Revise and edit brief to shorten
12/6/2024	JBM	2.6	Further editing to shorten brief per direction of Court
12/6/2024	SLW	0.1	Upon receipt of J. Seibel order waiving need for pre-motion conference, review thereof
12/9/2024	DJK	0.2	Call with JBM regarding Preliminary Approval TOA / TOC Assignment
12/9/2024	DJK	4.8	Creating TOA and TOC for Preliminary Approval Motion, double check all case citations and proofread
12/9/2024	JBM	0.2	Office conference with JLH re preliminary approval filings logistics
12/9/2024	JBM	0.2	Telephone conference with TP re preliminary approval filings logistics
12/9/2024	JBM	0.2	Attention to correspondence from DJK re MOL tables
12/9/2024	JBM	0.3	Office conference with DJK re MOL tables
12/9/2024	JBM	0.3	Save documents to case file
12/9/2024	JBM	0.4	Office conference with DJK re finalizing preliminary approval briefing and review documents in connection with same
12/9/2024	JBM	0.8	Prepare and file motion for preliminary approval
12/9/2024	JBM	0.9	Review revised version of MOL and finalize same for filing
12/10/2024	JBM	0.2	Attention to follow up email from defense counsel and respond to same
12/10/2024	JBM	0.3	Attention to email correspondence from defense counsel regarding class list and email response and email to D. Hutchinson in connection with same
12/11/2024	DJK	1	Revising/drafting letters to Court regarding preliminary approval filing
12/11/2024	JBM	0.2	Office conference with JLH and AB re preliminary approval courtesy copies
12/11/2024	JBM	0.7	Prepare courtesy copies of preliminary approval papers
12/12/2024	JBM	0.2	Email correspondence with AB and JLH re letter to court re full briefing of preliminary approval motion
12/12/2024	JBM	0.2	Office conference with AB and JLH re preliminary approval courtesy copies
12/12/2024	JBM	0.2	Save documents to case file
12/12/2024	JBM	0.7	Assemble and mail courtesy copies
12/17/2024	JBM	0.2	Telephone call with defense counsel regarding class list



Date	Atty	Time	Description
12/17/2024	JBM	0.2	Save documents to case file
12/17/2024	JBM	0.3	Attention to email correspondence from defense counsel re class list and email to defense counsel regarding same
12/18/2024	JBM	0.1	Email with SLW in connection with same
12/18/2024	JBM	0.2	Attention to preliminary approval order
12/18/2024	JBM	0.2	Attention to email from defense counsel regarding class list and draft follow up email to D. Hutchinson in connection with same
12/18/2024	SLW	0.2	Upon receipt of Court Order from Judge Seibel granting preliminary approval and setting final Fairness Hearing in April, review thereof
12/19/2024	AB	1	Communicated with B. McInturff re sealing issues; reviewed samples; reviewed sample motions to seal; discussed research assignment with D. Kieselstein.
12/19/2024	JBM	0.2	Office conference with AB re final approval preparation
12/19/2024	JBM	0.2	Further office conference with AB re firm records and motion to seal firm records
12/19/2024	JBM	0.2	Email to team re next steps re final approval filings and firm records
12/19/2024	JBM	0.3	Review prior sealing requests and documents filed in connection with same
12/19/2024	JBM	0.3	Attention to responsive email from D. Hutchinson and email to defense counsel in connection with same
12/19/2024	JBM	0.4	Review of J Seibel settlement approval transcript in Papa Johns case in connection with same
12/22/2024	JBM	0.4	Attention to emails from ESI team
12/22/2024	JBM	0.5	Revise and edit intro to preliminary approval memo
12/22/2024	JBM	1.4	Further edits to factual background and review docket in connection with same
1/2/2025	JBM	0.1	Update to do list
1/2/2025	JBM	0.3	Office conference with DJB and DJK re final approval memo
1/6/2025	DJK	0.1	Call with EDR re final approval motion
1/6/2025	DJK	0.4	Review of prior final approval motions for use in MBeer
1/6/2025	EDR	0.2	Call with DJK regarding motion for final approval of settlement.
1/10/2025	AB	1.3	Research caselaw re sealing of privileged firm records.
1/10/2025	JBM	0.1	Email to EDR in connection with same
1/10/2025	JBM	0.2	Attention to email from admin re timeline and term of service
1/13/2025	JBM	0.2	Attention to email correspondence regarding class list
1/14/2025	EDR	0.2	Call with defense counsel regarding settlement calendar.
1/14/2025	EDR	0.2	Call with W. Varon from Arden regarding settlement notice.
1/14/2025	EDR	1.9	Revise settlement timeline.
1/14/2025	EDR	2.4	Draft notice documents.
1/14/2025	JBM	0.1	Attention to voicemail from defense counsel re ACS calendar
1/14/2025	JBM	0.1	Office conference with EDR in connection with same
1/14/2025	JBM	0.2	Telephone call with defense counsel re notice issues
1/14/2025	JBM	0.2	Follow up office conference with EDR regarding notice milestones
1/14/2025	JBM	0.2	Office conference with EDR re notice and settlement payment calculation issues



Date	Atty	Time	Description
1/14/2025	JBM	0.2	Office conference with EDR re settlement calendar and reserve fund
1/14/2025	JBM	0.3	Attention to EDR emails re data issues and office conference with EDR in connection with same
1/15/2025	EDR	0.3	Email to Arden regarding settlement calendar and notice documents.
1/15/2025	EDR	1.7	Draft notice documents.
1/15/2025	JBM	0.3	Office conference with EDR re notice process
1/16/2025	EDR	0.4	Calls with data scientist regarding distribution of settlement to class.
1/16/2025	EDR	0.7	Review and analyze distribution of settlement to class.
1/17/2025	AB	3.3	Finalized research re sealing privileged firm records; reviewed relevant local rules, the Court individual rules, and ECF instructions on sealing requests.
1/17/2025	EDR	1.9	Review and analyze draft settlement distribution.
1/17/2025	JBM	0.1	Correspondence with AB re sealing of firm records
1/17/2025	JBM	0.3	Attention to correspondence from D. Hutchinson and settlement administrator re notice items
1/20/2025	AB	3.1	Researched the propriety of filing contemporaneous time records under seal in other circuits; drafted letter-motion for leave to file time records under seal.
1/21/2025	EDR	1.1	Review and analyze proposed allocation plan.
1/21/2025	JBM	0.2	Office conference with EDR re settlement distribution calculations
1/22/2025	DJK	0.5	Final approval motion
1/22/2025	EDR	0.2	Call with SLW regarding settlement administration.
1/22/2025	EDR	0.2	Emails with settlement administrator.
1/22/2025	EDR	0.3	Coordinate receiving class list from defense counsel.
1/22/2025	JBM	0.2	Attention to email correspondence re settlement administration
1/23/2025	EDR	0.2	Call with JBM regarding allocation plan.
1/23/2025	EDR	0.2	Review and analyze class list for completion.
1/23/2025	EDR	1.8	Revise and finalize notice and website documents.
1/24/2025	EDR	0.2	Send allocation plan to settlement administrator.
1/24/2025	EDR	0.6	Revise settlement allocation plan.
1/24/2025	JBM	0.1	Organize case file
1/24/2025	JBM	0.2	Attention to email correspondence related to settlement administration
1/28/2025	JBM	0.2	Attention to administration emails
1/30/2025	EDR	0.2	Call with defense counsel regarding settlement administration.
1/30/2025	EDR	0.2	Correspondence with settlement administrator regarding notice.
1/30/2025	JBM	0.3	Attention to voicemail from defense counsel and follow up correspondence and office conference with EDR in connection with same
1/31/2025	EDR	0.2	Correspondence with settlement administrator regarding notice documents.
1/31/2025	EDR	0.2	Call with W. Varon regarding notice documents.
1/31/2025	EDR	0.5	Revise notice documents.
1/31/2025	JBM	0.3	Attention to settlement administration emails



Date	Atty	Time	Description
2/2/2025	EDR	0.7	Revise notice documents and coordinate same with settlement administrator.
2/2/2025	JBM	0.2	Attention to EDR emails with administrator
2/3/2025	EDR	0.3	Correspondence with settlement administrator regarding notice documents.
2/3/2025	JBM	0.2	Attention to administration emails and file same
2/3/2025	JBM	0.2	Office conference with EDR re administration tasks
2/3/2025	TP	0.2	Attention to email correspondence between counsel and administrator re website and IVR.
2/4/2025	DJK	6.5	Mtn for Final Approval
2/7/2025	DJK	0.7	Revise attorney fee arguments in final approval motion
2/11/2025	JBM	0.2	Save documents to case file
2/13/2025	EDR	0.2	Call with DJK regarding final approval brief.
2/18/2025	DJK	4.3	Complete redlines to final approval motion, legal research regarding fee percentages in S.D.N.Y. Draft email to partner regarding final approval draft
2/18/2025	SLW	0.2	Upon receipt of Arden first initial weekly claims report regarding no opt outs, or exclusions to date, review thereof
2/20/2025	EDR	0.8	Revise final approval brief.
2/24/2025	EDR	2	Revise brief in support of final settlement approval.
2/24/2025	SLW	0.2	Upon receipt of second Arden initial weekly claims report regarding no opt outs, or exclusions to date, review thereof
2/25/2025	DJK	0.4	Revise fn10 for Final Approval Motion
2/25/2025	EDR	2.7	Revise brief in support of final approval of settlement.
3/10/2025	AB	3.2	Review and editing final approval declaration exhibits and formatting of same, additional proofing of typographical errors, further formatting of exhibits.



<b>Summary of Class Counsel's Lodestar</b>			
<b>Timekeeper</b>	<b>Rate</b>	<b>Total Hours</b>	<b>Total Fee</b>
Andrey Belenky, Shareholder and Partner	\$920	22.3	\$20,516.00
Daniel J. Brenner, Senior Associate	\$505	34.2	\$17,271.00
Daniel J. Kieselstein, Senior Associate	\$485	46.2	\$22,407.00
Ethan D. Roman, Counsel	\$675	801.6	\$541,080.00
Howard Foster, Co-counsel	\$800	2.8	\$2,240.00
J. Burkett McInturff, Shareholder and Partner	\$890	1150.6	\$1,024,034.00
Jessica L. Hunter, Counsel	\$655	67.5	\$44,212.50
Nathan A. Rice, Former Senior Associate	\$505	122	\$61,610.00
Steven L. Wittels, Founding Partner	\$1,185	313.5	\$371,497.50
Tiasha Palikovic, Shareholder and Partner	\$920	209.9	\$193,108.00
<b>Total</b>		<b>2770.6</b>	<b>\$2,297,976.00</b>